

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Monsanto Company - Luling Plant
Agency Interest No.: 1096
Monsanto Company
Luling, St. Charles Parish, Louisiana**

I. Background

Monsanto Company, Monsanto Company - Luling Plant, is an existing pesticides manufacturing facility. The Monsanto Company - Luling Plant Glyphosate Intermediate (GI) Unit currently operates under Permit No. 2574-V3, issued November 26, 2001.

This is the Part 70 operating permit for the facility.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Monsanto Company on December 9, 2003 requesting a Part 70 operating permit renewal. Additional information dated July 26, 2006, September 8, 2006, September 12, 2006, and November 1, 2006 were also received.

III. Description

The Glyphosate Intermediate (GI) Unit consists of fifteen production trains which produce glyphosate intermediate. The GI is produced by reacting disodium iminodiacetate (DSIDA) with phosphorous trichloride (PCl_3) and formalin (which is a mixture of formaldehyde and water). The process includes hydrolysis, PM reaction, crystallization, centrifugation, and drying operation (for GI trains A – D only).

Five thermal oxidation units are used to control the gas streams containing methyl chloride. Process scrubbers are used to control off gases from centrifuges, centrifuge feed tanks, wet cake screws, sumps, and formalin storage tanks, as well as off gases from the thermal oxidizers.

The drying operations at the GI trains A – D are controlled by bag filters followed by process scrubbers. Dust from the dried product transfer and packaging operations are controlled by two baghouses.

In this permit renewal, Monsanto requested to include the following changes:

- Remove the following equipment which was previously permitted but never installed (Reactor Train P and associated equipment): Tank 1680 DSIDA Day Tank; Tank 1707 Centrifuge Feed Tank MP-1; Tank 1715 Centrifuge Feed Tank MP-2; Tank 1501 M-P HCl Storage Tank; Tank 1510 HCl Scrubber Feed Tank; Tank 673 M-P Bulk Loading Sump Tank; Tank 391 Reslurry Tank O; Tank 491 Reslurry Tank P; Tank 184 M-P Off-Spec Tank; Tank 1686 CT Slurry Storage Tank; Tank 1505 M Centrifuge Siphon Tank; Tank 1506 N Centrifuge Siphon Tank; Vessel 451 PM Reactor P; Vessel 461 Crystallizer P; Equipment 1473 Centrifuge MP-1; Equipment 1480 Centrifuge MP-2.

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- Rename numerous equipment which were formerly identified as being associated Trains M-P to being associated with Trains M-O.
- Reconcile the following tanks: Renumber Reslurry Tank M to Tank 762, and Reslurry Tank N to Tank 772. Also the capacity of these tanks changed to 5,000 gallons.
- Remove the MSIDA facility because it has been shut down and dismantled. Therefore the following equipment to be removed: Tank 2375 MSIDA Storage Tank; Tank 2376 MSIDA Storage Tank; Tank 2377 MSIDA Storage Tank; Tank 016 MSIDA Quench Tank; Vessel 101 MSIDA Reactor; (E.P) 1-99 MSIDA Cooling Tower.
- Remove the following sources with are no longer in operation: E.P. 1-97 GI Wet Cake Loading Scrubber; E.P. 30-98 E/F Recovered Catalyst Tank; E.P. 31-98 G/H Recovered Catalyst Tank.
- Incorporate the case-by-case insignificant activity submitted July 20, 2004 which changes the service of the existing tanks E.P. 30-98 and E.P. 31-98 (E/ F and G/H Recovered Catalyst Tanks respectively) and provides new Emission Points: E.P. 7-06 CT Overheads Tank 1 and E.P. 8-06 CT Overheads Tank 2.
- Incorporate the case-by-case insignificant activity dated February 21, 2005 and February 24, 2005 which provided for two new Reslurry Tanks, Reslurry Tank C and Reslurry Tank D.
- Incorporate Monsanto's request to combine selected scrubber feeds to allow maintenance activities on certain scrubbers without shutting down the affected units. Specifically allow feed from Fume Scrubber A (E.P. 1-74) to Fume Scrubber B (E.P. 41-77) and vice versa. Also feed from the Formalin Tank Scrubber (E.P. 13-96) to either Fume Scrubber A (E.P. 1-74) or Fume Scrubber B (E.P. 41-77).
- Incorporate Letter of No Objection dated August 16, 2005 which allowed re-routing the vapor from three HCl storage tanks from Fume Scrubber A to Thermal Oxidizer 1.
- Incorporate Letter of No Objection dated April 19, 2005 which allowed the increase in size of the DSIDA Storage Tank No. 2 (E.P. 2-88) to 193,000 gallons.
- Reconcile HCl Surge Tank No. 1 (Tank No. 306) volume change from 800 gallons to 3000 gallons.
- Reconcile Bulk Centrifuge No. 1 (Equipment No. 710) change from 1,250 mm ID sized basket to 1,600 mm ID sized basket.
- Incorporate a unit-wide cap for rupture disk emissions. These rupture disk incidents were previously permitted under General Condition XVII prior to Title V permits. The rupture disks are installed on each GI Unit Reactor to protect the reactors from overpressure. Under normal conditions, any escaping vapors are routed to the scrubbers. However emission limitations cannot be met when a sudden surge of flow to the scrubbers results from the activation of a rupture disk. The rupture disks are vented to the scrubbers as follows: Trains A-D to E.P. 13-96; Trains E-F to E.P. 8-90; Trains G-H to E.P. 1-94; Trains I-L to E.P. 20-95; Trains M-O to E.P. 20-98. It is estimated that approximately 10 rupture disk activations occur per year.
- Reconcile biennially testing requirements for Thermal Oxidizers for concentrations of CO, NOx, and Methyl Chloride. Monsanto has shown compliance for the last 10 years. Therefore, only performance testing in accordance with the requirements of the permit renewal will be required along with continued monitoring of combustion temperature and oxygen.

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Estimated emissions in tons per year are as follows:

| <u>Pollutant</u> | <u>Before</u> | <u>After</u> | <u>Change</u> |
|------------------|---------------|--------------|---------------|
| PM ₁₀ | 25.89 | 25.49 | -0.40 |
| SO ₂ | 0.28 | 0.25 | -0.03 |
| NO _x | 37.71 | 37.71 | - |
| CO | 25.37 | 25.37 | - |
| VOC * | 47.29 | 46.67 | -0.62 |

***VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

| <u>Pollutant</u> | <u>Before</u> | <u>After</u> | <u>Change</u> |
|------------------|---------------|--------------|---------------|
| Methyl Chloride | 7.85 | 8.43 | +0.58 |
| Methanol | 7.13 | 7.13 | - |
| Formaldehyde | 17.44 | 16.89 | -0.55 |
| Total | 32.42 | 32.45 | +0.03 |

Other VOC (TPY): 14.21

Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

| <u>Pollutant</u> | <u>Before</u> | <u>After</u> | <u>Change</u> |
|-----------------------------|---------------|--------------|---------------|
| Hydrochloric Acid (non-VOC) | 7.00 | 7.09 | +0.09 |
| Ammonia (non-VOC) | 6.16 | 6.16 | - |
| Total | 13.16 | 13.25 | +0.09 |

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) does not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

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V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the *St. Charles Herald-Guide*, Boutte, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Dispersion Model(s) Used: None

| Pollutant | Time Period | Calculated Maximum Ground Level Concentration | Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS}) |
|-----------|-------------|---|--|
| | | | |

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VIII. General Condition XVII Activities

| Work Activity | Schedule | Emission Rates | |
|--|--|----------------|----------|
| | | HCl | (Ton/yr) |
| Remove Carbonate by reducing pH set-point to 3 | 120 hrs/yr for each scrubber (Fume Scrubbers A & B and Process Scrubbers E, G, I & M) | | 0.002 |

IX. Insignificant Activities

| ID No.: | Description | Citation |
|-----------|--|---|
| Tank 606 | Caustic Storage Tank (150,000 gallons) | Insignificant Activity per LAC 33:III.501.B.5.B.40. |
| Tank 755 | Caustic Storage Tank (4,100 gallons) | Insignificant Activity per LAC 33:III.501.B.5.B.40. |
| Tank 215 | Caustic Storage Tank (18,300 gallons) | Insignificant Activity per LAC 33:III.501.B.5.B.40. |
| Tank 470 | Caustic Storage Tank (18,300 gallons) | Insignificant Activity per LAC 33:III.501.B.5.B.40. |
| Tank 190 | Caustic Storage Tank (10,000 gallons) | Insignificant Activity per LAC 33:III.501.B.5.B.40. |
| Tank 1190 | Caustic Storage Tank (10,000 gallons) | Insignificant Activity per LAC 33:III.501.B.5.B.40. |

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | LAC 33:III.Chapter | | | | | | | | | | | | | | | | | |
|---------|---|--------------------|---|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|-----|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 | 59* |
| FUG 006 | GI Unit | 1 | | | | | | | | | | | | 1 | | | 1 | 1 | 1 |
| FUG 006 | 42-96B Fugitive Emissions from Glyphosate Plant | | | | | | | | | | | | | | | | | | |
| GRP 039 | Scrubbers A - E, G, GI Centrifuge, I, M | 1 | 1 | | | | | | | | | | | | 2 | | | 1 | |
| EQT 224 | 1-74 Fume Scrubber A | 1 | 1 | | | | | | | | | | | | 2 | | | 1 | |
| EQT 225 | 41-77 Fume Scrubber B | 1 | 1 | | | | | | | | | | | | 2 | | | 1 | |
| EQT 226 | 1-88 Fume Scrubber C | 1 | 1 | | | | | | | | | | | | 2 | | | 1 | |
| EQT 227 | 1-89 Fume Scrubber D | 1 | 1 | | | | | | | | | | | | 2 | | | 1 | |
| EQT 228 | 8-90 Process Scrubber E | 1 | 1 | | | | | | | | | | | | 2 | | | 1 | |
| EQT 229 | 1-94 Process Scrubber G | 1 | 1 | | | | | | | | | | | | 2 | | | 1 | |
| EQT 230 | 3-95 GI Centrifuge Scrubber | 1 | 1 | | | | | | | | | | | | 2 | | | 1 | |
| EQT 231 | 20-95 Fume Scrubber I | 1 | 1 | | | | | | | | | | | | 2 | | | 1 | |
| EQT 232 | 20-98 Process Scrubber M | 1 | 1 | | | | | | | | | | | | 2 | | | 1 | |
| EQT 233 | 13-96 Formaldehyde Tank Scrubber | | | | | | | | | | | | | | 2 | | | 1 | |
| EQT 235 | 4-86 PIA Warehouse Silo 787 Baghouse | | | | | | | | | | | | | | 2 | | | 1 | |
| EQT 236 | 9-90 PIA Warehouse Silo 160 Baghouse | | | | | | | | | | | | | | 1 | | | | |
| GRP 040 | DSIDA Storage Tanks 1 - 6 | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 237 | 5-86 DSIDA Storage Tank No. 1 | | | | | | | | | | | | | | 3 | | | 1 | |

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|---------|---|--------------------|----|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|-----|
| | | 5▲ | .9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 | 59* |
| EQT 238 | 2-88 DSIDA Storage Tank No. 2 | | | | | | | | | | | | | | | | | | |
| EQT 239 | 7-90 DSIDA Storage Tank No. 3 | | | | | | | | | | | | | | | | | | |
| EQT 240 | 24-95 DSIDA Storage Tank No. 4 | | | | | | | | | | | | | | | | | | |
| EQT 241 | 37-95 DSIDA Storage Tank No. 5 | | | | | | | | | | | | | | | | | | |
| EQT 242 | 23-98 DSIDA Storage Tank No. 6 | | | | | | | | | | | | | | | | | | |
| EQT 243 | 7-06 CT Overheads Tank 1 | | | | | | | | | | | | | | | | | | |
| EQT 244 | 8-06 CT Overheads Tank 2 | | | | | | | | | | | | | | | | | | |
| EQT 245 | 24-98 G/H Cooling Tower | | | | | | | | | | | | | | | | | | |
| EQT 246 | 25-98 C/D Cooling Tower | | | | | | | | | | | | | | | | | | |
| EQT 247 | 26-98 E/F Cooling Tower | | | | | | | | | | | | | | | | | | |
| EQT 248 | 28-98 I/J/K/L Cooling Tower | | | | | | | | | | | | | | | | | | |
| EQT 249 | 29-98 M/N/O Cooling Tower | | | | | | | | | | | | | | | | | | |
| GRP 037 | Thermal Oxidizers 1, 2, 3, 5 | 1 | | | | | | | | | | | | | | 3 | | | 1 |
| EQT 295 | Equipment No. 363 Thermal Oxidizer No. 1 | 1 | | | | | | | | | | | | | | 3 | | | 1 |
| EQT 296 | Equipment No. 373B Thermal Oxidizer No. 2 | 1 | | | | | | | | | | | | | | 3 | | | 1 |
| EQT 297 | Equipment No. 880 Thermal Oxidizer No. 3 | 1 | | | | | | | | | | | | | | 3 | | | 1 |
| EQT 298 | Equipment No. 170 Thermal Oxidizer No. 4 | 1 | | | | | | | | | | | | | | 3 | | | 1 |
| EQT 299 | Equipment No. 325 Thermal Oxidizer No. 5 | 1 | | | | | | | | | | | | | | 3 | | | 1 |

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|---------|--------------------------------------|--------------------|---|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 |
| GRP 024 | List A Tanks | | | | | | | | | | | | | | | | | |
| EQT 251 | Tank No. 101 Formalin Storage Tank | | | | | | | | | | | | | | | | | |
| EQT 252 | Tank No. 102 Formalin Storage Tank | | | | | | | | | | | | | | | | | |
| EQT 253 | Tank No. 201 Formalin Storage Tank | | | | | | | | | | | | | | | | | |
| EQT 254 | Tank No. 203 Formalin Storage Tank | | | | | | | | | | | | | | | | | |
| EQT 255 | Tank No. 692 Formalin Storage Tank | | | | | | | | | | | | | | | | | |
| EQT 256 | Tank No. 375 DSIDA Day Tank | | | | | | | | | | | | | | | | | |
| EQT 257 | Tank No. 376 DSIDA Day Tank | | | | | | | | | | | | | | | | | |
| EQT 258 | Tank No. 680 DSIDA Day Tank | | | | | | | | | | | | | | | | | |
| GRP 025 | List B Tanks | | | | | | | | | | | | | | | | | |
| EQT 260 | Tank No. 761 Centrifuge Feed Tank A | | | | | | | | | | | | | | | | | |
| EQT 261 | Tank No. 771 Centrifuge Feed Tank B | | | | | | | | | | | | | | | | | |
| EQT 262 | Tank No. 665 Centrifuge Feed Tank C | | | | | | | | | | | | | | | | | |
| EQT 263 | Tank No. 855A Centrifuge Feed Tank D | | | | | | | | | | | | | | | | | |
| EQT 264 | Tank No. 555A Centrifuge Feed Tank E | | | | | | | | | | | | | | | | | |
| EQT 265 | Tank No. 755A Centrifuge Feed Tank F | | | | | | | | | | | | | | | | | |
| EQT 266 | Tank No. 055 Centrifuge Feed Tank G | | | | | | | | | | | | | | | | | |
| EQT 267 | Tank No. 855B Centrifuge Feed Tank H | | | | | | | | | | | | | | | | | |

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|---------|---|--------------------|---|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|-----|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 | 59* |
| EQT 268 | Tank No. 355 Centrifuge Feed Tank I | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 269 | Tank No. 455 Centrifuge Feed Tank J | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 270 | Tank No. 555B Centrifuge Feed Tank K | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 271 | Tank No. 955 Centrifuge Feed Tank L | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 272 | Tank No. 171B Centrifuge Feed Tank M | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 273 | Tank No. 175 Centrifuge Feed Tank N | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 274 | Tank No. 271 Centrifuge Feed Tank O | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 275 | Tank No. 371 Centrifuge Feed Tank P | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 278 | Tank No. 701 Bulk Centrifuge Feed Tank 1 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 279 | Tank No. 733 Bulk Centrifuge Feed Tank 2 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 280 | Tank No. 781 Bulk Centrifuge Feed Tank 3 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 281 | Tank No. 655 Bulk Centrifuge Feed Tank 4 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 282 | Tank No. 808 Bulk Centrifuge Feed Tank 5 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 283 | Tank No. 755B Bulk Centrifuge Feed Tank 6 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 284 | Tank No. 150 A-D Centrate Receiver | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 285 | Tank No. 460 E-F Centrate Receiver | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 286 | Tank No. 260 G-H Centrate Receiver | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 287 | Tank No. 660 I-L Centrate Receiver | | | | | | 3 | | | | | | | | | | | 1 | |

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|---------|--|--------------------|---|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|-----|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 | 59* |
| EQT 288 | Tank No. 187 M-O Centrate Receiver | | | | | | 3 | | | | | | | | | | | | |
| EQT 289 | Tank No. 713 Bulk Centrate Receiver | | | | | | 3 | | | | | | | | | | | | |
| EQT 291 | Tank No. 301 HCl Storage Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 292 | Tank No. 302 HCl Storage Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 293 | Tank No. 333A HCl Storage Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 300 | Tank No. 127 A-D Waste Collection Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 301 | Tank No. 274 E-F Waste Collection Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 302 | Tank No. 472A G-H Waste Collection Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 303 | Tank No. 830 I-L Waste Collection Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 304 | Tank No. 601 M-O Waste Collection Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 305 | Tank No. 722 Bulk Waste Collection Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 307 | Tank No. 510 A-D BCME Scrubber Hold Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 308 | Tank No. 290 E-F BCME Scrubber Hold Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 309 | Tank No. 490 G-H BCME Scrubber Hold Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 310 | Tank No. 188 I-L BCME Scrubber Hold Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 311 | Tank No. 308 M-O BCME Scrubber Hold Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 312 | Tank No. 511.1 A-D BCME Hydrolysis Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 313 | Tank No. 511.2 A-D BCME Hydrolysis Tank | | | | | | 3 | | | | | | | | | | | | |

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| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 | 59* |
| EQT 314 | Tank No. 282 E-F BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | 1 | |
| EQT 315 | Tank No. 283 E-F BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | 1 | |
| EQT 316 | Tank No. 482 G-H BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | 1 | |
| EQT 317 | Tank No. 483 G-H BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | 1 | |
| EQT 318 | Tank No. 191A I-L BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | 1 | |
| EQT 319 | Tank No. 192 I-L BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | 1 | |
| EQT 320 | Tank No. 311 M-O BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | 1 | |
| EQT 321 | Tank No. 312 M-O BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | 1 | |
| GRP 026 | List C Tanks | | | | | | | | | | | | | | | | | 1 | |
| EQT 322 | Tank No. 729 Acid Heel Tank No. 1 | | | | | | | | | | | | | | | | | 1 | |
| EQT 323 | Tank No. 621 Acid Heel Tank No. 2 | | | | | | | | | | | | | | | | | 1 | |
| EQT 324 | Tank No. 121 Acid Heel Tank No. 3 | | | | | | | | | | | | | | | | | 1 | |
| EQT 325 | Tank No. 021 Acid Heel Tank No. 4 | | | | | | | | | | | | | | | | | 1 | |
| EQT 326 | Tank No. 321 Acid Heel Tank No. 5 | | | | | | | | | | | | | | | | | 1 | |
| EQT 327 | Tank No. 421 Acid Heel Tank No. 6 | | | | | | | | | | | | | | | | | 1 | |
| EQT 328 | Tank No. 105 Acid Heel Tank No. 7 | | | | | | | | | | | | | | | | | 1 | |
| EQT 329 | Tank No. 205 Acid Heel Tank No. 8 | | | | | | | | | | | | | | | | | 1 | |
| EQT 330 | Tank No. 329 HCl Scrubber Tank No. 1 | | | | | | | | | | | | | | | | | 1 | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
 Agency Interest No.: 1096
Monsanto Company
Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | LAC 33:III Chapter | | | | | | | | | | | | | | | | | |
|---------|--|--------------------|---|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|-----|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 | 59* |
| EQT 331 | Tank No. 633 HCl Scrubber Tank No. 2 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 332 | Tank No. 133 HCl Scrubber Tank No. 3 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 333 | Tank No. 033 HCl Scrubber Tank No. 4 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 334 | Tank No. 333B HCl Scrubber Tank No. 5 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 335 | Tank No. 113 HCl Scrubber Tank No. 6 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 336 | Tank No. 306 HCl Surge Tank No. 1 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 337 | Tank No. 139 HCl Surge Tank No. 3 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 338 | Tank No. 039 HCl Surge Tank No. 4 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 339 | Tank No. 339 HCl Surge Tank No. 5 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 340 | Tank No. 109 HCl Surge Tank No. 6 | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 341 | Tank No. 751 A-D Centrifuge Washwater Tank | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 342 | Tank No. 374 A-D TO Quench Tank | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 343 | Tank No. 364 E-F TO Quench Tank | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 344 | Tank No. 883 G-H TO Quench Tank | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 345 | Tank No. 171B I-L TO Quench Tank | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 346 | Tank No. 332 M-O TO Quench Tank | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 347 | Tank No. 580 TO Condensate Collection Tank | | | | | | 3 | | | | | | | | | | | 1 | |
| EQT 348 | Tank No. 163 TO Condensate Collection Tank | | | | | | 3 | | | | | | | | | | | 1 | |

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Monsanto Company - Luling Plant
Agency Interest No.: 1096
Monsanto Company
Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | LAC 33:III.Chapter | | | | | | | | | | | | | | | | | |
|---------|--|--------------------|---|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|-----|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 | 59* |
| EQT 349 | Tank No. 317 TO Condensate Collection Tank | | | | | | 3 | | | | | | | | | | | 1 | |
| GRP 027 | List D Tanks | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 350 | Tank No. 462 Reslurry Tank I | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 351 | Tank No. 472B Reslurry Tank J | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 352 | Tank No. 562A Reslurry Tank L | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 353 | Tank No. 191B Reslurry Tank M | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 354 | Tank No. 291 Reslurry Tank N | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 357 | Tank No. 360 Basket Wash Surge Tank | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 358 | Tank No. 597 Basket Wash Collection Tank | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 359 | Tank No. 181 Basket Wash Collection Tank | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 360 | Tank No. 265 Off Spec Tank | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 362 | Tank No. 340 CT Slurry Storage Tank | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 363 | Tank No. 476 CT Slurry Storage Tank | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 364 | Tank No. 686 CT Slurry Storage Tank | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 366 | Tank No. 706 Intermediate Feed Tank | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 367 | Tank No. 176 Intermediate Feed Tank | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 371 | Tank No. 517 A-D Emergency Vent Tank | | | | | | | | 3 | | | | | | | | | 1 | |
| EQT 372 | Tank No. 126 E-F Emergency Vent Tank | | | | | | | | 3 | | | | | | | | | 1 | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
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Monsanto Company
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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | LAC 33:III.Chapter | | | | | | | | | | | | | | | | |
|---------|--|--------------------|---|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 |
| EQT 373 | Tank No. 026 G-H Emergency Vent Tank | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 374 | Tank No. 818 I-L Emergency Vent Tank | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 375 | Tank No. 304 M-O Emergency Vent Tank | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 376 | Tank No. 562B Reslurry Tank E | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 377 | Tank No. 572 Reslurry Tank E | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 378 | Tank No. 762A Reslurry Tank F | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 379 | Tank No. 772A Reslurry Tank F | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 380 | Tank No. 062 Reslurry Tank G | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 381 | Tank No. 072 Reslurry Tank G | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 382 | Tank No. 862 Reslurry Tank H | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 383 | Tank No. 872 Reslurry Tank H | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 384 | Tank No. 672 Reslurry Tank | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 385 | Tank No. 762B Reslurry Tank | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 386 | Tank No. 772B Reslurry Tank | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 387 | Tank No. 117 Sump Collection Tank | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 388 | Tank No. 797 Basket Wash Collection Tank | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 389 | Tank No. 142 Basket Wash Collection Tank | | | | | | 3 | | | | | | | | 1 | | | |
| EQT 390 | Tank No. 042 Basket Wash Collection Tank | | | | | | 3 | | | | | | | | 1 | | | |

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | LAC 33:III Chapter | | | | | | | | | | | | | | | | | |
|---------|---|--------------------|---|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|-----|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 | 59* |
| EQT 391 | Tank No. 717 Solids Recovery Tank | | | | | | | | | | | | | | | | | | |
| EQT 392 | Tank No. 815 Hydrolyzer Quench Tank | | | | | | | | | | | | | | | | | | |
| EQT 393 | Tank No. 301 Hydrolyzer Quench Tank | | | | | | | | | | | | | | | | | | |
| EQT 395 | Tank No. 505 I-L Centrifuge Siphon Tank | | | | | | | | | | | | | | | | | | |
| EQT 398 | Tank No. 705 Bulk Centrifuge Siphon Tank | | | | | | | | | | | | | | | | | | |
| EQT 399 | Tank No. 610 L Centrifuge Overflow Tank | | | | | | | | | | | | | | | | | | |
| EQT 400 | Tank No. 668 M-O Centrifuge Overflow Tank | | | | | | | | | | | | | | | | | | |
| EQT 559 | Tank No. 860 Reslurry Tank D | | | | | | | | | | | | | | | | | | |
| EQT 560 | Tank No. 660 Reslurry Tank C | | | | | | | | | | | | | | | | | | |
| GRP 032 | Hydrolyzers 1 - 8 | | | | | | | | | | | | | | | | | | |
| EQT 402 | Vessel No. 726 Hydrolyzer No. 1 | | | | | | | | | | | | | | | | | | |
| EQT 403 | Vessel No. 618 Hydrolyzer No. 2 | | | | | | | | | | | | | | | | | | |
| EQT 404 | Vessel No. 118 Hydrolyzer No. 3 | | | | | | | | | | | | | | | | | | |
| EQT 405 | Vessel No. 018 Hydrolyzer No. 4 | | | | | | | | | | | | | | | | | | |
| EQT 406 | Vessel No. 318 Hydrolyzer No. 5 | | | | | | | | | | | | | | | | | | |
| EQT 407 | Vessel No. 418 Hydrolyzer No. 6 | | | | | | | | | | | | | | | | | | |
| EQT 408 | Vessel No. 102 Hydrolyzer No. 7 | | | | | | | | | | | | | | | | | | |
| EQT 409 | Vessel No. 202 Hydrolyzer No. 8 | | | | | | | | | | | | | | | | | | |

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | LAC 33:III.Chapter | | | | | | | | | | | | | | | | | |
|------------|------------------------------|--------------------|---|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|-----|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 | 59* |
| GRP 033 | PM Reactors A - H, M - O | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 410 | Vessel No. 735 PM Reactor A | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 411 | Vessel No. 738 PM Reactor B | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 412 | Vessel No. 645 PM Reactor C | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 413 | Vessel No. 845A PM Reactor D | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 414 | Vessel No. 145 PM Reactor E | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 415 | Vessel No. 245 PM Reactor F | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 416 | Vessel No. 045 PM Reactor G | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 417 | Vessel No. 845B PM Reactor H | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 422 | Vessel No. 151 PM Reactor M | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 423 | Vessel No. 251 PM Reactor N | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 424 | Vessel No. 351 PM Reactor O | | | | | | | | | | | | | | 3 | | | 1 | |
| GRP 034 | PM Reactors I - L | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 418 | Vessel No. 345 PM Reactor I | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 419 | Vessel No. 945 PM Reactor J | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 420 | Vessel No. 445 PM Reactor K | | | | | | | | | | | | | | 3 | | | 1 | |
| EQT 421 | Vessel No. 545 PM Reactor L | | | | | | | | | | | | | | 3 | | | 1 | |
| GRP 035 | Crystallizers A - O | | | | | | | | | | | | | | 2 | | | 1 | |

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | LAC 33:III Chapter | | | | | | | | | | | | | | | | | |
|------------|--|--------------------|---|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|-----|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 | 59* |
| EQT 426 | Vessel No. 747 Crystallizer A | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 427 | Vessel No. 745 Crystallizer B | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 428 | Vessel No. 650 Crystallizer C | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 429 | Vessel No. 850A Crystallizer D | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 430 | Vessel No. 550A Crystallizer E | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 431 | Vessel No. 750 Crystallizer F | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 432 | Vessel No. 050 Crystallizer G | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 433 | Vessel No. 850B Crystallizer H | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 434 | Vessel No. 350 Crystallizer I | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 435 | Vessel No. 950 Crystallizer J | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 436 | Vessel No. 450 Crystallizer K | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 437 | Vessel No. 550B Crystallizer L | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 438 | Vessel No. 161 Crystallizer M | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 439 | Vessel No. 261 Crystallizer N | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 440 | Vessel No. 361 Crystallizer O | | | | | | | | | | | | | 2 | | | 1 | | |
| GRP 036 | Centrifuges A-P & Bulk Centrifuges 1-6 | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 442 | Equipment No. 763 Centrifuge A | | | | | | | | | | | | | 2 | | | 1 | | |
| EQT 443 | Equipment No. 773 Centrifuge B | | | | | | | | | | | | | 2 | | | 1 | | |

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | LAC 33:III.Chapter | | | | | | | | | | | | 1 | 1 | 1 | 1 | 1 |
|---------|--|--------------------|---|----|----|----|------|-------|------|------|------|------|------|---|---|---|---|---|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | | | | | |
| EQT 444 | Equipment No. 657A Centrifuge C | | | | | | | | | | | | | | | | | |
| EQT 445 | Equipment No. 857A Centrifuge D | | | | | | | | | | | | | | | | | |
| EQT 446 | Equipment No. 557A Centrifuge E | | | | | | | | | | | | | | | | | |
| EQT 447 | Equipment No. 757A Centrifuge F | | | | | | | | | | | | | | | | | |
| EQT 448 | Equipment No. 057 Centrifuge G | | | | | | | | | | | | | | | | | |
| EQT 449 | Equipment No. 857B Centrifuge H | | | | | | | | | | | | | | | | | |
| EQT 450 | Equipment No. 357 Centrifuge I | | | | | | | | | | | | | | | | | |
| EQT 451 | Equipment No. 957 Centrifuge J | | | | | | | | | | | | | | | | | |
| EQT 452 | Equipment No. 457 Centrifuge K | | | | | | | | | | | | | | | | | |
| EQT 453 | Equipment No. 557B Centrifuge L | | | | | | | | | | | | | | | | | |
| EQT 454 | Equipment No. 173 Centrifuge M | | | | | | | | | | | | | | | | | |
| EQT 455 | Equipment No. 174 Centrifuge N | | | | | | | | | | | | | | | | | |
| EQT 456 | Equipment No. 273 Centrifuge O | | | | | | | | | | | | | | | | | |
| EQT 457 | Equipment No. 373A Centrifuge P | | | | | | | | | | | | | | | | | |
| EQT 460 | Equipment No. 710A Bulk Centrifuge No. 1 | | | | | | | | | | | | | | | | | |
| EQT 461 | Equipment No. 720 Bulk Centrifuge No. 2 | | | | | | | | | | | | | | | | | |
| EQT 462 | Equipment No. 780 Bulk Centrifuge No. 3 | | | | | | | | | | | | | | | | | |
| EQT 463 | Equipment No. 657B Bulk Centrifuge No. 4 | | | | | | | | | | | | | | | | | |

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Monsanto Company
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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | LAC 33:III Chapter | | | | | | | | | | | | | | | | | |
|---------|--|--------------------|---|----|----|----|------|-------|------|------|------|------|------|----|-----|-----|-----|----|-----|
| | | 5▲ | 9 | 11 | 13 | 15 | 2103 | 2104* | 2107 | 2111 | 2113 | 2115 | 2121 | 22 | 29* | 51* | 53* | 56 | 59* |
| EQT 464 | Equipment No. 790 Bulk Centrifuge No. 5 | | | | | | | | | | | | | 2 | | | | 1 | |
| EQT 465 | Equipment No. 757B Bulk Centrifuge No. 6 | | | | | | | | | | | | | 2 | | | | 1 | |
| EQT 466 | Equipment No. 710B Flash Dryer A | | | | | | | | | | | | | | | | | | |
| EQT 467 | Equipment No. 410 Flash Dryer B | | | | | | | | | | | | | 2 | | | | | |
| EQT 468 | Equipment No. 665 Flash Dryer C | | | | | | | | | | | | | 2 | | | | | |
| EQT 469 | Equipment No. 865 Flash Dryer D | | | | | | | | | | | | | 2 | | | | | |
| GRP 038 | Scrubbers - Rupture Disks Emissions Cap | | | | | | | | | | | | | | | | | | |

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHAP | | | | | | 40 CFR | | |
|------------|---|----------------|----------------|----------------|-----|-----|-----|-----------|---|---|----|---|----|------------------|----|------|----|----|----|--------|---|--|
| | | A | K _a | K _b | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 | | | |
| | GI Unit | | | | 3 | 3 | 3 | 3 | 1 | | 1 | 1 | | | 1 | | 1 | 2 | 1 | | | |
| FUG 006 | 42-96B Fugitive Emissions from Glyphosate Plant | | | | | | | | | | | | | | | | | | | | 1 | |
| GRP 039 | Scrubbers A - E, G, GI Centrifuge, I, M | | | | | | | | | | | | | | | | | | | | 1 | |
| EQT 224 | 1-74 Fume Scrubber A | | | | | | | | | | | | | | | | | | | | 1 | |
| EQT 225 | 41-77 Fume Scrubber B | | | | | | | | | | | | | | | | | | | | 1 | |
| EQT 226 | 1-88 Fume Scrubber C | | | | | | | | | | | | | | | | | | | | 1 | |
| EQT 227 | 1-89 Fume Scrubber D | | | | | | | | | | | | | | | | | | | | 1 | |
| EQT 228 | 8-90 Process Scrubber E | | | | | | | | | | | | | | | | | | | | 1 | |
| EQT 229 | 1-94 Process Scrubber G | | | | | | | | | | | | | | | | | | | | 1 | |
| EQT 230 | 3-95 GI Centrifuge Scrubber | | | | | | | | | | | | | | | | | | | | 1 | |
| EQT 231 | 20-95 Fume Scrubber I | | | | | | | | | | | | | | | | | | | | 1 | |
| EQT 232 | 20-98 Process Scrubber M | | | | | | | | | | | | | | | | | | | | 1 | |
| EQT 233 | 13-96 Formaldehyde Tank Scrubber | | | | | | | | | | | | | | | | | | | | 1 | |
| EQT 235 | 4-86 PIA Warehouse Silo 787 Baghouse | | | | | | | | | | | | | | | | | | | | 1 | |

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 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHAP | | | | | |
|---------|--------------------------------------|----------------|----|----|-----|-----|-----|-----------|---|---|----|---|----|------------------|----|------|-----|----|----|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | F52 | 64 | 68 |
| EQT 236 | 9-90 PIA Warehouse Silo 160 Baghouse | | | | | | | | | | | | | | | | | | |
| GRP 040 | DSIDA Storage Tanks 1 - 6 | | | | | | | | | | | | | | | | | | |
| EQT 237 | 5-86 DSIDA Storage Tank No. 1 | | | | | | | | | | | | | | | | | | |
| EQT 238 | 2-88 DSIDA Storage Tank No. 2 | | | | | | | | | | | | | | | | | | |
| EOT 239 | 7-90 DSIDA Storage Tank No. 3 | | | | | | | | | | | | | | | | | | |
| EQT 240 | 24-95 DSIDA Storage Tank No. 4 | | | | | | | | | | | | | | | | | | |
| EQT 241 | 37-95 DSIDA Storage Tank No. 5 | | | | | | | | | | | | | | | | | | |
| EQT 242 | 23-98 DSIDA Storage Tank No. 6 | | | | | | | | | | | | | | | | | | |
| EQT 243 | 7-06 CT Overheads Tank 1 | | | | | | | | | | | | | | | | | | |
| EQT 244 | 8-06 CT Overheads Tank 2 | | | | | | | | | | | | | | | | | | |
| EQT 245 | 24-98 G/H Cooling Tower | | | | | | | | | | | | | | | | | | |
| EQT 246 | 25-98 C/D Cooling Tower | | | | | | | | | | | | | | | | | | |
| EQT 247 | 26-98 E/F Cooling Tower | | | | | | | | | | | | | | | | | | |
| EQT 248 | 28-98 I/J/K/L Cooling Tower | | | | | | | | | | | | | | | | | | |
| EQT 249 | 29-98 M/N/O Cooling Tower | | | | | | | | | | | | | | | | | | |
| GRP 037 | Thermal Oxidizers 1, 2, 3, 5 | | | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
 Agency Interest No.: 1096
 Monsanto Company
 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | 40 CFR 61 | | | 40 CFR 63 NESHAP | | | 40 CFR | | | | | | | |
|---------|---|----------------|----|----|-----------|-----|-----|------------------|---|---|--------|---|----|---|----|------|----|----|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 |
| EQT 295 | Equipment No. 363 Thermal Oxidizer No. 1 | | | | | | | | | | | | | | | | | |
| EQT 296 | Equipment No. 373B Thermal Oxidizer No. 2 | | | | | | | | | | | | | | | | | |
| EQT 297 | Equipment No. 880 Thermal Oxidizer No. 3 | | | | | | | | | | | | | | | | | |
| EQT 298 | Equipment No. 170 Thermal Oxidizer No. 4 | | | | | | | | | | | | | | | 1 | | |
| EQT 299 | Equipment No. 325 Thermal Oxidizer No. 5 | | | | | | | | | | | | | | | | | |
| GRP 024 | List A Tanks | | | | | | | | | | | | | | | | | |
| EQT 251 | Tank No. 101 Formalin Storage Tank | | | | | | | | | | | | | | | | | |
| EQT 252 | Tank No. 102 Formalin Storage Tank | | | | | | | | | | | | | | | 3 | | |
| EQT 253 | Tank No. 201 Formalin Storage Tank | | | | | | | | | | | | | | | 3 | | |
| EQT 254 | Tank No. 203 Formalin Storage Tank | | | | | | | | | | | | | | | 3 | | |
| EQT 255 | Tank No. 692 Formalin Storage Tank | | | | | | | | | | | | | | | 3 | | |
| EQT 256 | Tank No. 375 DSIDA Day Tank | | | | | | | | | | | | | | | 3 | | |
| EQT 257 | Tank No. 376 DSIDA Day Tank | | | | | | | | | | | | | | | 3 | | |
| EQT 258 | Tank No. 680 DSIDA Day Tank | | | | | | | | | | | | | | | 3 | | |
| GRP 025 | List B Tanks | | | | | | | | | | | | | | | 3 | | |
| EQT 260 | Tank No. 761 Centrifuge Feed Tank A | | | | | | | | | | | | | | | 3 | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
 Agency Interest No.: 1096
 Monsanto Company
 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHAP | | | | | | 40 CFR | | | | | |
|---------|--|----------------|----|----|-----|-----|-----|-----------|---|---|----|---|----|------------------|----|------|----|----|----|--------|--|--|--|--|--|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 | | | | | | |
| EQT 261 | Tank No. 771 Centrifuge Feed Tank B | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 262 | Tank No. 665 Centrifuge Feed Tank C | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 263 | Tank No. 855A Centrifuge Feed Tank D | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 264 | Tank No. 555A Centrifuge Feed Tank E | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 265 | Tank No. 755A Centrifuge Feed Tank F | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 266 | Tank No. 055 Centrifuge Feed Tank G | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 267 | Tank No. 855B Centrifuge Feed Tank H | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 268 | Tank No. 355 Centrifuge Feed Tank I | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 269 | Tank No. 455 Centrifuge Feed Tank J | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 270 | Tank No. 555B Centrifuge Feed Tank K | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 271 | Tank No. 955 Centrifuge Feed Tank L | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 272 | Tank No. 171B Centrifuge Feed Tank M | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 273 | Tank No. 175 Centrifuge Feed Tank N | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 274 | Tank No. 271 Centrifuge Feed Tank O | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 275 | Tank No. 371 Centrifuge Feed Tank P | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 278 | Tank No. 701 Bulk Centrifuge Feed Tank 1 | | | | | | | | | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
 Agency Interest No.: 1096
Monsanto Company
Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHAP | | | | | | 40 CFR | | | | | |
|---------|---|----------------|----|----|-----|-----|-----|-----------|---|---|----|---|----|------------------|----|------|----|----|----|--------|--|--|--|--|--|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 | | | | | | |
| EQT 279 | Tank No. 713 Bulk Centrifuge Feed Tank 2 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 280 | Tank No. 781 Bulk Centrifuge Feed Tank 3 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 281 | Tank No. 655 Bulk Centrifuge Feed Tank 4 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 282 | Tank No. 808 Bulk Centrifuge Feed Tank 5 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 283 | Tank No. 755B Bulk Centrifuge Feed Tank 6 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 284 | Tank No. 150 A-D Centrate Receiver | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 285 | Tank No. 460 E-F Centrate Receiver | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 286 | Tank No. 260 G-H Centrate Receiver | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 287 | Tank No. 660 I-L Centrate Receiver | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 288 | Tank No. 187 M-O Centrate Receiver | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 289 | Tank No. 713 Bulk Centrate Receiver | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 291 | Tank No. 301 HCl Storage Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 292 | Tank No. 302 HCl Storage Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 293 | Tank No. 333A HCl Storage Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 300 | Tank No. 127 A-D Waste Collection Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 301 | Tank No. 274 E-F Waste Collection Tank | | | | | | | | | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant

Agency Interest No.: 1096

Monsanto Company

Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHAP | | | | | | 40 CFR | |
|---------|--|----------------|----|----|-----|-----|-----|-----------|---|---|----|---|----|------------------|----|------|----|----|----|--------|--|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 | | |
| EQT 302 | Tank No. 472A G-H Waste Collection Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 303 | Tank No. 830 I-L Waste Collection Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 304 | Tank No. 601 M-O Waste Collection Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 305 | Tank No. 722 Bulk Waste Collection Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 307 | Tank No. 510 A-D BCME Scrubber Hold Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 308 | Tank No. 290 E-F BCME Scrubber Hold Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 309 | Tank No. 490 G-H BCME Scrubber Hold Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 310 | Tank No. 188 I-L BCME Scrubber Hold Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 311 | Tank No. 308 M-O BCME Scrubber Hold Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 312 | Tank No. 511.1 A-D BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 313 | Tank No. 511.2 A-D BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 314 | Tank No. 282 E-F BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 315 | Tank No. 283 E-F BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 316 | Tank No. 482 G-H BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 317 | Tank No. 483 G-H BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 318 | Tank No. 191A I-L BCME Hydrolysis Tank | | | | | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
 Agency Interest No.: 1096
 Monsanto Company
 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No. | Description | 40 CFR 60 NSPS | | | 40 CFR 61 | | | 40 CFR 63 NESHAP | | | 40 CFR | | | | | | | |
|---------|---------------------------------------|----------------|----|----|-----------|-----|-----|------------------|---|---|--------|---|----|---|----|------|----|----|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 |
| EQT 319 | Tank No. 192 I-L BCME Hydrolysis Tank | | | | 3 | | | | | | | | | | | | | |
| EQT 320 | Tank No. 311 M-O BCME Hydrolysis Tank | | | | | 3 | | | | | | | | | | | | |
| EQT 321 | Tank No. 312 M-O BCME Hydrolysis Tank | | | | | | 3 | | | | | | | | | | | |
| GRP 026 | List C Tanks | | | | | | | 3 | | | | | | | | | | |
| EQT 322 | Tank No. 729 Acid Heel Tank No. 1 | | | | | | | 3 | | | | | | | | | | |
| EQT 323 | Tank No. 621 Acid Heel Tank No. 2 | | | | | | | | 3 | | | | | | | | | |
| EQT 324 | Tank No. 121 Acid Heel Tank No. 3 | | | | | | | | 3 | | | | | | | | | |
| EQT 325 | Tank No. 021 Acid Heel Tank No. 4 | | | | | | | | | 3 | | | | | | | | |
| EQT 326 | Tank No. 321 Acid Heel Tank No. 5 | | | | | | | | | 3 | | | | | | | | |
| EQT 327 | Tank No. 421 Acid Heel Tank No. 6 | | | | | | | | | | 3 | | | | | | | |
| EQT 328 | Tank No. 105 Acid Heel Tank No. 7 | | | | | | | | | | 3 | | | | | | | |
| EQT 329 | Tank No. 205 Acid Heel Tank No. 8 | | | | | | | | | | | 3 | | | | | | |
| EQT 330 | Tank No. 329 HCl Scrubber Tank No. 1 | | | | | | | | | | | 3 | | | | | | |
| EQT 331 | Tank No. 633 HCl Scrubber Tank No. 2 | | | | | | | | | | | | 3 | | | | | |
| EQT 332 | Tank No. 133 HCl Scrubber Tank No. 3 | | | | | | | | | | | | 3 | | | | | |
| EQT 333 | Tank No. 033 HCl Scrubber Tank No. 4 | | | | | | | | | | | | | 3 | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
 Agency Interest No.: 1096
 Monsanto Company
 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHAP | | | | | | 40 CFR | | | | | |
|---------|--|----------------|----|----|-----|-----|-----|-----------|---|---|----|---|----|------------------|----|------|----|----|----|--------|--|--|--|--|--|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 | | | | | | |
| EQT 334 | Tank No. 333B HCl Scrubber Tank No. 5 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 335 | Tank No. 113 HCl Scrubber Tank No. 6 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 336 | Tank No. 306 HCl Surge Tank No. 1 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 337 | Tank No. 139 HCl Surge Tank No. 3 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 338 | Tank No. 039 HCl Surge Tank No. 4 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 339 | Tank No. 339 HCl Surge Tank No. 5 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 340 | Tank No. 109 HCl Surge Tank No. 6 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 341 | Tank No. 751 A-D Centrifuge Washwater Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 342 | Tank No. 374 A-D TO Quench Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 343 | Tank No. 364 E-F TO Quench Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 344 | Tank No. 883 G-H TO Quench Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 345 | Tank No. 171B I-L TO Quench Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 346 | Tank No. 332 M-O TO Quench Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 347 | Tank No. 580 TO Condensate Collection Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 348 | Tank No. 163 TO Condensate Collection Tank | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 349 | Tank No. 317 TO Condensate Collection Tank | | | | | | | | | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
 Agency Interest No.: 1096
 Monsanto Company
 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHAP | | | | | | 40 CFR | |
|---------|--|----------------|----|----|-----|-----|-----|-----------|---|---|----|---|----|------------------|----|------|----|----|----|--------|--|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 | | |
| GRP 027 | List D Tanks | | | | | | | | | | | | | | | | | | | | |
| EQT 350 | Tank No. 462 Reslurry Tank I | | | | | | | | | | | | | | | | | | | | |
| EQT 351 | Tank No. 472B Reslurry Tank J | | | | | | | | | | | | | | | | | | | | |
| EQT 352 | Tank No. 562A Reslurry Tank L | | | | | | | | | | | | | | | | | | | | |
| EQT 353 | Tank No. 191B Reslurry Tank M | | | | | | | | | | | | | | | | | | | | |
| EQT 354 | Tank No. 291 Reslurry Tank N | | | | | | | | | | | | | | | | | | | | |
| EQT 357 | Tank No. 360 Basket Wash Surge Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 358 | Tank No. 597 Basket Wash Collection Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 359 | Tank No. 181 Basket Wash Collection Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 360 | Tank No. 265 Off Spec Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 362 | Tank No. 340 CT Slurry Storage Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 363 | Tank No. 476 CT Slurry Storage Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 364 | Tank No. 686 CT Slurry Storage Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 366 | Tank No. 706 Intermediate Feed Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 367 | Tank No. 176 Intermediate Feed Tank | | | | | | | | | | | | | | | | | | | | |
| EQT 371 | Tank No. 517 A-D Emergency Vent Tank | | | | | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
 Agency Interest No.: 1096
 Monsanto Company
 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHAP | | | | | | 40 CFR | | | | | |
|---------|--------------------------------------|----------------|----|----|-----|-----|-----|-----------|---|---|----|---|----|------------------|----|------|----|----|----|--------|--|--|--|--|--|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 | | | | | | |
| EQT 372 | Tank No. 126 E-F Emergency Vent Tank | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 373 | Tank No. 026 G-H Emergency Vent Tank | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 374 | Tank No. 818 I-L Emergency Vent Tank | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 375 | Tank No. 304 M-O Emergency Vent Tank | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 376 | Tank No. 562B Reslurry Tank E | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 377 | Tank No. 572 Reslurry Tank E | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 378 | Tank No. 762A Reslurry Tank F | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 379 | Tank No. 772A Reslurry Tank F | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 380 | Tank No. 062 Reslurry Tank G | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 381 | Tank No. 072 Reslurry Tank G | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 382 | Tank No. 862 Reslurry Tank H | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 383 | Tank No. 872 Reslurry Tank H | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 384 | Tank No. 672 Reslurry Tank | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 385 | Tank No. 762B Reslurry Tank | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 386 | Tank No. 772B Reslurry Tank | | | | | | | | 3 | | | | | | | | | | | | | | | | |
| EQT 387 | Tank No. 117 Sump Collection Tank | | | | | | | | 3 | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
 Agency Interest No.: 1096
 Monsanto Company
 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | 40 CFR 61 | | | 40 CFR 63 NESHAP | | | 40 CFR | | | | | | | | |
|------------|---|----------------|----|----|-----------|-----|-----|------------------|---|---|--------|---|----|---|----|------|----|----|----|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 |
| EQT 388 | Tank No. 797 Basket Wash Collection Tank | | | | 3 | | | | | | | | | | | | | | |
| EQT 389 | Tank No. 142 Basket Wash Collection Tank | | | | | 3 | | | | | | | | | | | | | |
| EQT 390 | Tank No. 042 Basket Wash Collection Tank | | | | | | 3 | | | | | | | | | | | | |
| EQT 391 | Tank No. 717 Solids Recovery Tank | | | | | | | 3 | | | | | | | | | | | |
| EQT 392 | Tank No. 815 Hydrolyzer Quench Tank | | | | | | | | 3 | | | | | | | | | | |
| EQT 393 | Tank No. 301 Hydrolyzer Quench Tank | | | | | | | | | 3 | | | | | | | | | |
| EQT 395 | Tank No. 505 I-L Centrifuge Siphon Tank | | | | | | | | | | 3 | | | | | | | | |
| EQT 398 | Tank No. 705 Bulk Centrifuge Siphon Tank | | | | | | | | | | | 3 | | | | | | | |
| EQT 399 | Tank No. 610 L Centrifuge Overflow Tank | | | | | | | | | | | | 3 | | | | | | |
| EQT 400 | Tank No. 668 M-O Centrifuge Overflow Tank | | | | | | | | | | | | | 3 | | | | | |
| EQT 559 | Tank No. 860 Resturry Tank D | | | | | | | | | | | | | | 3 | | | | |
| EQT 560 | Tank No. 660 Resturry Tank C | | | | | | | | | | | | | | | 3 | | | |
| GRP 032 | Hydrolyzers 1 - 8 | | | | | | | | | | | | | | | | | | |
| EQT 402 | Vessel No. 726 Hydrolyzer No. 1 | | | | | | | | | | | | | | | | | | |
| EQT 403 | Vessel No. 618 Hydrolyzer No. 2 | | | | | | | | | | | | | | | | | | |
| EQT 404 | Vessel No. 118 Hydrolyzer No. 3 | | | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
 Agency Interest No.: 1096
 Monsanto Company
 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHAP | | | | | | 40 CFR | |
|---------|---------------------------------|----------------|----|----|-----|-----|-----|-----------|---|---|----|---|----|------------------|----|------|----|----|----|--------|--|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 | | |
| EQT 405 | Vessel No. 018 Hydrolyzer No. 4 | | | | | | | | | | | | | | | | | | | | |
| EQT 406 | Vessel No. 318 Hydrolyzer No. 5 | | | | | | | | | | | | | | | | | | | | |
| EQT 407 | Vessel No. 418 Hydrolyzer No. 6 | | | | | | | | | | | | | | | | | | | | |
| EQT 408 | Vessel No. 102 Hydrolyzer No. 7 | | | | | | | | | | | | | | | | | | | | |
| EQT 409 | Vessel No. 202 Hydrolyzer No. 8 | | | | | | | | | | | | | | | | | | | | |
| GRP 033 | PM Reactors A - H, M - O | | | | | | | | | | | | | | | | | | | | |
| EQT 410 | Vessel No. 735 PM Reactor A | | | | | | | | | | | | | | | | | | | | |
| EQT 411 | Vessel No. 738 PM Reactor B | | | | | | | | | | | | | | | | | | | | |
| EQT 412 | Vessel No. 645 PM Reactor C | | | | | | | | | | | | | | | | | | | | |
| EQT 413 | Vessel No. 815A PM Reactor D | | | | | | | | | | | | | | | | | | | | |
| EQT 414 | Vessel No. 145 PM Reactor E | | | | | | | | | | | | | | | | | | | | |
| EQT 415 | Vessel No. 245 PM Reactor F | | | | | | | | | | | | | | | | | | | | |
| EQT 416 | Vessel No. 045 PM Reactor G | | | | | | | | | | | | | | | | | | | | |
| EQT 417 | Vessel No. 815B PM Reactor H | | | | | | | | | | | | | | | | | | | | |
| EQT 422 | Vessel No. 151 PM Reactor M | | | | | | | | | | | | | | | | | | | | |
| EQT 423 | Vessel No. 251 PM Reactor N | | | | | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant

Agency Interest No.: 1096

Monsanto Company

Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | 40 CFR 61 | | | 40 CFR 63 NESHAP | | | 40 CFR | | | | | | | | |
|---------|--------------------------------|----------------|----|----|-----------|-----|-----|------------------|---|---|--------|---|----|---|----|------|----|----|----|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 |
| EQT 424 | Vessel No. 351 PM Reactor O | | | | | | | | | | | | | | | | | | |
| GRP 034 | PM Reactors J - L | | | | | | | | | | | | | | | | | 1 | |
| EQT 418 | Vessel No. 345 PM Reactor I | | | | | | | | | | | | | | | | | 1 | |
| EQT 419 | Vessel No. 945 PM Reactor J | | | | | | | | | | | | | | | | | 1 | |
| EQT 420 | Vessel No. 445 PM Reactor K | | | | | | | | | | | | | | | | | 1 | |
| EQT 421 | Vessel No. 545 PM Reactor L | | | | | | | | | | | | | | | | | 1 | |
| GRP 035 | Crystallizers A - O | | | | | | | | | | | | | | | | | | |
| EQT 426 | Vessel No. 747 Crystallizer A | | | | | | | | | | | | | | | | | | |
| EQT 427 | Vessel No. 745 Crystallizer B | | | | | | | | | | | | | | | | | | |
| EQT 428 | Vessel No. 650 Crystallizer C | | | | | | | | | | | | | | | | | | |
| EQT 429 | Vessel No. 850A Crystallizer D | | | | | | | | | | | | | | | | | | |
| EQT 430 | Vessel No. 550A Crystallizer E | | | | | | | | | | | | | | | | | | |
| EQT 431 | Vessel No. 750 Crystallizer F | | | | | | | | | | | | | | | | | | |
| EQT 432 | Vessel No. 050 Crystallizer G | | | | | | | | | | | | | | | | | | |
| EQT 433 | Vessel No. 850B Crystallizer H | | | | | | | | | | | | | | | | | | |
| EQT 434 | Vessel No. 350 Crystallizer I | | | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant

Agency Interest No.: 1096

Monsanto Company

Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHPAP | | | | | | 40 CFR | | | | | |
|------------|--|----------------|----|----|-----|-----|-----|-----------|---|---|----|---|----|-------------------|----|------|----|----|----|--------|--|--|--|--|--|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 | | | | | | |
| EQT 435 | Vessel No. 950 Crystallizer J | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 436 | Vessel No. 450 Crystallizer K | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 437 | Vessel No. 550B Crystallizer L | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 438 | Vessel No. 161 Crystallizer M | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 439 | Vessel No. 261 Crystallizer N | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 440 | Vessel No. 361 Crystallizer O | | | | | | | | | | | | | | | | | | | | | | | | |
| GRP 036 | Centrifuges A-P & Bulk Centrifuges 1-6 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 442 | Equipment No. 763 Centrifuge A | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 443 | Equipment No. 773 Centrifuge B | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 444 | Equipment No. 657A Centrifuge C | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 445 | Equipment No. 857A Centrifuge D | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 446 | Equipment No. 557A Centrifuge E | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 447 | Equipment No. 757A Centrifuge F | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 448 | Equipment No. 057 Centrifuge G | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 449 | Equipment No. 857B Centrifuge H | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 450 | Equipment No. 357 Centrifuge I | | | | | | | | | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
 Agency Interest No.: 1096
 Monsanto Company
 Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHAP | | | | | | 40 CFR | | | | | |
|---------|--|----------------|----|----|-----|-----|-----|-----------|---|---|----|---|----|------------------|----|------|----|----|----|--------|--|--|--|--|--|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 | | | | | | |
| EQT 451 | Equipment No. 957 Centrifuge J | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 452 | Equipment No. 457 Centrifuge K | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 453 | Equipment No. 557B Centrifuge L | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 454 | Equipment No. 173 Centrifuge M | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 455 | Equipment No. 174 Centrifuge N | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 456 | Equipment No. 273 Centrifuge O | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 457 | Equipment No. 373A Centrifuge P | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 460 | Equipment No. 710A Bulk Centrifuge No. 1 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 461 | Equipment No. 720 Bulk Centrifuge No. 2 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 462 | Equipment No. 780 Bulk Centrifuge No. 3 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 463 | Equipment No. 657B Bulk Centrifuge No. 4 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 464 | Equipment No. 790 Bulk Centrifuge No. 5 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 465 | Equipment No. 757B Bulk Centrifuge No. 6 | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 466 | Equipment No. 710B Flash Dryer A | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 467 | Equipment No. 410 Flash Dryer B | | | | | | | | | | | | | | | | | | | | | | | | |
| EQT 468 | Equipment No. 665 Flash Dryer C | | | | | | | | | | | | | | | | | | | | | | | | |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
Agency Interest No.: 1096
Monsanto Company
Luling, St. Charles Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

| ID No.: | Description | 40 CFR 60 NSPS | | | | | | 40 CFR 61 | | | | | | 40 CFR 63 NESHAP | | | | | | 40 CFR | | | | | |
|---------|---|----------------|----|----|-----|-----|-----|-----------|---|---|----|---|----|------------------|----|------|----|----|----|--------|--|--|--|--|--|
| | | A | Ka | Kb | III | NNN | RRR | VVV | A | J | FF | A | HH | Q | VV | FFFF | 52 | 64 | 68 | | | | | | |
| EQT 469 | Equipment No. 865 Flash Dryer D | | | | | | | | | | | | | | | | | | | | | | | | |
| GRP 038 | Scrubbers - Rupture Disks Emissions Cap | | | | | | | | | | | | | | | | | | | | | | | | |

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
Agency Interest No.: 1096
Monsanto Company
Luling, St. Charles Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

| ID No: | Requirement | Notes |
|---------------|---|--|
| GI Unit | NSPS Subpart III | DOES NOT APPLY. This unit does not produce any chemicals in the SOCMII list of 40 CFR 60.489 |
| | NSPS Subpart NNN | DOES NOT APPLY. This unit does not produce any chemicals in the SOCMII list of 40 CFR 60.489 |
| | NSPS Subpart RRR | DOES NOT APPLY. This unit does not produce any chemicals in the SOCMII list of 40 CFR 60.489 |
| | NSPS Subpart VVV | DOES NOT APPLY. This unit does not produce any chemicals in the SOCMII list of 40 CFR 60.489 |
| | 40 CFR 64 | EXEMPT. Exempt per 40 CFR 64.2(3)(B)(1)(i). |
| | Compliance Assurance Monitoring | |
| GRP 039 | LAC 33:III.2115. Waste Gas Disposal | EXEMPT. Exempt per LAC 33:III.2115.H.4. VOC emissions from the scrubbers <= 100 lbs in any 24 hour period. |
| GRP 040 | DSIDA Storage Tanks | DOES NOT APPLY. Vapor pressure < 1.5 psia |
| | LAC 33:III.2103. Storage of VOC | |
| | 40 CFR 60.110b NSPS Subpart Kb for VOC tanks | DOES NOT APPLY. Vapor pressure < 1.5 psia |
| EQT 233 | Formalin Tank Scrubber | EXEMPT. Exempt per LAC 33:III.2115.H.4. VOC emissions from the scrubbers <= 100 lbs in any 24 hour period. |
| EQT 245 - 249 | Cooling Towers NESHAP Subpart Q | DOES NOT APPLY. No water treating chemicals containing chromium used. |

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Monsanto Company - Luling Plant
 Agency Interest No.: 1096
Monsanto Company
Luling, St. Charles Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

| ID No. | Requirement | Notes |
|---------|---|---|
| GRP 024 | LAC 33:III.2103 Storage of Volatile Organic Compounds 40 CFR 60.116b NSPS Subpart Kb for VOC tanks | DOES NOT APPLY. Vapor pressure <= 1.5 psia |
| GRP 025 | LAC 33:III.2103 Storage of Volatile Organic Compounds 40 CFR 60.116b NSPS Subpart Kb for VOC tanks | DOES NOT APPLY. Vapor pressure < 1.5 psia and VOC concentration in liquid < 5%. |
| GRP 026 | LAC 33:III.2103 Storage of Volatile Organic Compounds 40 CFR 60.116b NSPS Subpart Kb for VOC tanks | DOES NOT APPLY. Vapor pressure <= 1.5 psia |
| GRP 027 | LAC 33:III.2103 Storage of Volatile Organic Compounds 40 CFR 60.116b NSPS Subpart Kb for VOC tanks | DOES NOT APPLY. Vapor pressure < 1.5 psia |
| GRP 032 | LAC 33:III.2115. Waste Gas Disposal GRP 035 Crystallizers | DOES NOT APPLY. Volume < 10,500 gallons and VOC concentration is liquid < 5%. |
| | | EXEMPT. Exempt per LAC 33:III.2115.H.4. VOC emissions from the vent streams <= 100 lbs in any 24 hour period. |

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Monsanto Company - Luling Plant
Agency Interest No.: 1096
Monsanto Company
Luling, St. Charles Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

| ID No: | Requirement | Notes |
|---|---|---|
| GRP 036 Centrifuges | LAC 33:III.2115. Waste Gas Disposal | EXEMPT. Exempt per LAC 33:III.2115.H.4. VOC emissions from the vent streams <= 100 lbs in any 24 hour period. |
| EQT 298 & GRP 037 Thermal Oxidizers | LAC 33:III.2115 Waste Gas Disposal | DOES NOT APPLY. This section does not apply to waste gas streams that are required by another federal or state regulation to ... reduce VOC to a more stringent standard. |
| GRP 033 & GRP 034 PM Reactors | | PM Reactors are vented to Thermal Oxidizers. |
| EQT 466 - 469 Flash Dryers | LAC 33:III.Chapter 15 Emissions Standards for Sulfur Dioxide | EXEMPT. Exempt per LAC 33:III.1503.C $\text{SO}_2 < 250 \text{ TPY}$ |
| GRP 037 & EQT 298 Thermal Oxidizers | | |

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
 - 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];

40 CFR PART 70 GENERAL CONDITIONS

2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of

40 CFR PART 70 GENERAL CONDITIONS

attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]

- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
 - 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 - 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 - 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 - 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;

40 CFR PART 70 GENERAL CONDITIONS

5. changes in emissions would not qualify as a significant modification; and
 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Surveillance Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]

40 CFR PART 70 GENERAL CONDITIONS

- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 - 1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 - 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 - 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 - 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 - 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 - 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated December 9, 2003, along with supplemental information dated July 26, 2006, September 8, 2006, September 12, 2006 and November 1, 2006.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Surveillance Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Surveillance Division with a written report as specified below.
 - A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
 1. Report by June 30 to cover January through March
 2. Report by September 30 to cover April through June
 3. Report by December 31 to cover July through September

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

4. Report by March 31 to cover October through December
 - D. Each report submitted in accordance with this condition shall contain the following information:
 1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
 - E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
 - 1. Generally be less than 5 TPY
 - 2. Be less than the minimum emission rate (MER)
 - 3. Be scheduled daily, weekly, monthly, etc., or
 - 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
 La. Dept. of Environmental Quality
 Post Office Box 4302
 Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

All ID: 1096 Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

| Also Known As: | ID | Name | User Group | Start Date |
|--------------------|-------------------|--|-------------------------------------|------------------------------------|
| | LA04924 | Monsanto Agriculture | Air Permitting | 08-05-2002 |
| | ADV# | | Asbestos | 01-16-2003 |
| 2520-00005 | | Monsanto Co - Luling Plant | CDS Number | 08-07-1970 |
| 2520-0005 | | Monsanto Co - Luling Plant | Emission Inventory | 03-03-2004 |
| 43-0420020 | LAD001700756 | Monsanto Co - Luling | Federal Tax ID | 11-21-1999 |
| PMT/PC/CA | | GPRRA Baselines | Hazardous Waste Notification | 08-18-1980 |
| LAD001700756 | | Monsanto | Hazardous Waste Permitting | 10-01-1997 |
| LA0005266 | WP1251 | WPC File Number | Inactive & Abandoned Sites | 08-04-1981 |
| | | WPC State Permit Number | LPDES Permit # | 05-22-2003 |
| | | Priority 1 Emergency Site | LWDPS Permit # | 06-25-2003 |
| | | Radioactive Material License | Priority 1 Emergency Site | 07-18-2006 |
| | | X-Ray Registration Number | Radiation License Number | 12-20-2000 |
| | | Site ID # | Radiation X-ray Registration Number | 09-08-2004 |
| GD-089-1769 | 45673 | Monsanto Ag Products Co | Solid Waste Facility No. | 04-30-2001 |
| 48373 | | Monsanto Co | TEMPO Merge | 03-15-2001 |
| 2520-0005 | | Toxic Emissions Data Inventory # | TEMPO Merge | 03-15-2001 |
| 45006590 | | UST Facility ID (from UST legacy data) | Toxic Emissions Data Inventory # | 01-01-1991 |
| | | | Underground Storage Tanks | 10-12-2002 |
| | | | Main Phone: | 9857858211 |
| Physical Location: | | 12501 River Rd (portion of) Luling, LA 70070 | | |
| Mailing Address: | | PO Box 174 Luling, LA 700700174 | Mailing Address | |
| Related People: | | Name | Phone (Type) | Relationship |
| | Armand Bourque | 12501 River Rd Luling, LA 70070 | 9857858217 (WP) | Katrina Response Contact for |
| | Darren Clouatre | 12501 River Rd Luling, LA 70070 | darren.p.clouatre@n | Radiation Safety Officer for |
| | Darren Clouatre | 12501 River Rd Luling, LA 70070 | 9857853586 (WP) | Radiation Safety Officer for |
| | Darren Clouatre | 12501 River Rd Luling, LA 70070 | darren.p.clouatre@n | Radiation Contact For |
| | Darren Clouatre | 12501 River Rd Luling, LA 70070 | 9857855586 (WP) | Radiation Contact For |
| | Darren Clouatre | 12501 River Rd Luling, LA 70070 | 9857853845 (WF) | Radiation Safety Officer for |
| | Darren Clouatre | 12501 River Rd Luling, LA 70070 | 9857853845 (WF) | Radiation Contact For |
| | Allen R. Dent | 12501 S River Rd Luling, LA 70070 | 9857853578 (WP) | Hazardous Waste Permit Contact For |
| | George A. McGowan | PO Box 174 Luling, LA 700700174 | 9857858211 (WP) | Responsible Official for |

General Information

AI ID: 1096 Monsanto Co - Luling Plant
Activity Number: PER20030007
Permit Number: 2574-V4
Air - Title V Regular Permit Renewal

| Related People: | Name | Mailing Address | Phone (Type) | Relationship |
|------------------------|-----------------------------------|--|-----------------|--|
| | George A. McGowan | PO Box 174 Luling, LA 70070-0174 | 9857858211 (WP) | Haz. Waste Billing Party for |
| | George A. McGowan | PO Box 174 Luling, LA 70070-0174 | 9857858211 (WP) | Water Billing Party for |
| | William Rhodes II | PO Box 174 Luling, LA 70070-0174 | 9857853866 (WP) | Air Permit Contact For |
| | William Rhodes II | PO Box 174 Luling, LA 70070-0174 | 9857853346 (WF) | Air Permit Contact For |
| Related Organizations: | Name | Address | Phone (Type) | Relationship |
| | Monsanto Co | PO Box 174 Luling, LA 70070-0174 | 9857853211 (WP) | Operates |
| | Monsanto Co | PO Box 174 Luling, LA 70070-0174 | 9857853211 (WP) | Air Billing Party for |
| | Monsanto Co | PO Box 174 Luling, LA 70070-0174 | 9857853211 (WP) | Water Billing Party for |
| | Monsanto Co | PO Box 174 Luling, LA 70070-0174 | 9857853211 (WP) | Haz. Waste Billing Party for |
| | Monsanto Co | PO Box 174 Luling, LA 70070-0174 | 9857853211 (WP) | Radiation License Billing Party for |
| | Monsanto Co | PO Box 174 Luling, LA 70070-0174 | 9857853211 (WP) | Radiation Registration Billing Party for |
| | Monsanto Co | PO Box 174 Luling, LA 70070-0174 | 9857853211 (WP) | Owns |
| | Monsanto Co CT Corporation System | 8550 United Plaza Blvd Baton Rouge, LA 70809 | 9857853211 (WP) | Agent of Service for |
| SIC Codes: | 2899, Chemical preparations, nec | | | |

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit.
Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

| ID | Description | Tank Volume | Max. Operating Rate | Normal Operating Rate | Contents | Operating Time |
|--------|--------------------------------------|----------------|---------------------|---|----------|-----------------------|
| EQT224 | 1-74 Fume Scrubber A | | | 170 gallons/min | | 8760 hr/yr (All Year) |
| EQT225 | 4-1-77 Fume Scrubber B | | | 170 gallons/min | | 8760 hr/yr (All Year) |
| EQT226 | 1-88 Fume Scrubber C | | | 150 gallons/min | | 8760 hr/yr (All Year) |
| EQT227 | 1-89 Fume Scrubber D | | | 150 gallons/min | | 8760 hr/yr (All Year) |
| EQT228 | 8-90 Process Scrubber E | | | 140 gallons/min | | 8760 hr/yr (All Year) |
| EQT229 | 1-94 Process Scrubber G | | | 140 gallons/min | | 8760 hr/yr (All Year) |
| EQT230 | 3-95 GI Centrifuge Scrubber | | | 90 gallons/min | | 8760 hr/yr (All Year) |
| EQT231 | 20-95 Fume Scrubber I | | | 360 gallons/min | | 8760 hr/yr (All Year) |
| EQT232 | 20-98 Process Scrubber M | | | 360 gallons/min | | 8760 hr/yr (All Year) |
| EQT233 | 13-96 Formaldehyde Tank Scrubber | | | 60 gallons/min | | 8760 hr/yr (All Year) |
| EQT235 | 4-86 PIA Warehouse Silo 787 Baghouse | | | 2000 ft^3/min (actual) | | 8760 hr/yr (All Year) |
| EQT236 | 9-90 PIA Warehouse Silo 160 Baghouse | | | 1100 ft^3/min (actual) | | 8760 hr/yr (All Year) |
| EQT237 | 5-86 DSIDA Storage Tank No. 1 | 150000 gallons | | 29 MM gallons/yr | | 8760 hr/yr (All Year) |
| EQT238 | 2-88 DSIDA Storage Tank No. 2 | 193000 gallons | | 29 MM gallons/yr | | 8760 hr/yr (All Year) |
| EQT239 | 7-90 DSIDA Storage Tank No. 3 | 193000 gallons | | 48 MM gallons/yr | | 8760 hr/yr (All Year) |
| EQT240 | 24-95 DSIDA Storage Tank No. 4 | 125000 gallons | | 26 MM gallons/yr | | 8760 hr/yr (All Year) |
| EQT241 | 37-95 DSIDA Storage Tank No. 5 | 125000 gallons | | 26 MM gallons/yr | | 8760 hr/yr (All Year) |
| EQT242 | 23-98 DSIDA Storage Tank No. 6 | 125000 gallons | | 150 gallons/min | | 8760 hr/yr (All Year) |
| EQT243 | 7-06 CT Overheads Tank 1 | 14000 gallons | | 150 gallons/min | | 8760 hr/yr (All Year) |
| EQT244 | B-06 CT Overheads Tank 2 | 14000 gallons | | 5800 gallons/min | | 8760 hr/yr (All Year) |
| EQT245 | 24-98 G/H Cooling Tower | | | 5800 gallons/min | | 8760 hr/yr (All Year) |
| EQT246 | 25-98 C/D Cooling Tower | | | 5800 gallons/min | | 8760 hr/yr (All Year) |
| EQT247 | 26-98 E/F Cooling Tower | | | 5800 gallons/min | | 8760 hr/yr (All Year) |
| EQT248 | 28-98 I/J/K/L Cooling Tower | | | 15000 gallons/min | | 8760 hr/yr (All Year) |
| EQT249 | 29-98 M/N/O Cooling Tower | | | 15000 gallons/min | | 8760 hr/yr (All Year) |
| EQT251 | Tank No. 101 Formalin Storage Tank | 30000 gallons | | Formalin, Water, Methanol, trace of Formic Acid | | 8760 hr/yr (All Year) |
| EQT252 | Tank No. 102 Formalin Storage Tank | 30000 gallons | | Formalin, Water, Methanol, trace of Formic Acid | | 8760 hr/yr (All Year) |
| EQT253 | Tank No. 201 Formalin Storage Tank | 30000 gallons | | Formalin, Water, Methanol, trace of Formic Acid | | 8760 hr/yr (All Year) |
| EQT254 | Tank No. 203 Formalin Storage Tank | 30000 gallons | | Formalin, Water, Methanol, trace of Formic Acid | | 8760 hr/yr (All Year) |
| EQT255 | Tank No. 692 Formalin Storage Tank | 30000 gallons | | Formalin, Water, Methanol, trace of Formic Acid | | 8760 hr/yr (All Year) |
| EQT256 | Tank No. 375 DSIDA Day Tank | 19900 gallons | | DSIDA, Water, trace of Organics | | 8760 hr/yr (All Year) |
| EQT257 | Tank No. 376 DSIDA Day Tank | 19900 gallons | | DSIDA, Water, trace of Organics | | 8760 hr/yr (All Year) |
| EQT258 | Tank No. 680 DSIDA Day Tank | 30000 gallons | | DSIDA, Water, trace of Organics | | 8760 hr/yr (All Year) |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

| ID | Description | Tank Volume | Max. Operating Rate | Normal Operating Rate | Contents | Operating Time |
|--------|---|---------------|---------------------|-----------------------|--|-----------------------|
| EQT260 | Tank No. 761 Centrifuge Feed Tank A | 15000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT261 | Tank No. 771 Centrifuge Feed Tank B | 15000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT262 | Tank No. 665 Centrifuge Feed Tank C | 15000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT263 | Tank No. 855A Centrifuge Feed Tank D | 15000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT264 | Tank No. 555A Centrifuge Feed Tank E | 15000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT265 | Tank No. 755A Centrifuge Feed Tank F | 15000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT266 | Tank No. 055 Centrifuge Feed Tank G | 15000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT267 | Tank No. 855B Centrifuge Feed Tank H | 15000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT268 | Tank No. 355 Centrifuge Feed Tank I | 25000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT269 | Tank No. 455 Centrifuge Feed Tank J | 25000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT270 | Tank No. 555B Centrifuge Feed Tank K | 25000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT271 | Tank No. 955 Centrifuge Feed Tank L | 25000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT272 | Tank No. 1718 Centrifuge Feed Tank M | 25000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT273 | Tank No. 175 Centrifuge Feed Tank N | 25000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT274 | Tank No. 271 Centrifuge Feed Tank O | 25000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT275 | Tank No. 371 Centrifuge Feed Tank P | 25000 gallons | | | Water, GI, NaCl, CH ₂ O, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT278 | Tank No. 701 Bulk Centrifuge Feed Tank 1 | 25000 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT279 | Tank No. 733 Bulk Centrifuge Feed Tank 2 | 25000 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT280 | Tank No. 781 Bulk Centrifuge Feed Tank 3 | 25000 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT281 | Tank No. 655 Bulk Centrifuge Feed Tank 4 | 25000 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT282 | Tank No. 808 Bulk Centrifuge Feed Tank 5 | 25000 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT283 | Tank No. 755B Bulk Centrifuge Feed Tank 6 | 25000 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT284 | Tank No. 150 A-D Centrate Receiver | 7500 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT285 | Tank No. 460 E-F Centrate Receiver | 7500 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT286 | Tank No. 260 G-H Centrate Receiver | 7500 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT287 | Tank No. 660 I-L Centrate Receiver | 14500 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT288 | Tank No. 187 M-O Centrate Receiver | 14500 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT289 | Tank No. 713 Bulk Centrate Receiver | 9000 gallons | | | Water, GI, NaCl, trace of Organics | 8760 hr/yr (All Year) |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER2003007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

| ID | Description | Tank Volume | Max. Operating Rate | Normal Operating Rate | Contents | Operating Time |
|--------|---|---------------|---------------------|-------------------------------------|-------------------------------------|-----------------------|
| EQT291 | Tank No. 301 HCl Storage Tank | 30000 gallons | | | HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT292 | Tank No. 302 HCl Storage Tank | 30000 gallons | | | HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT293 | Tank No. 333A HCl Storage Tank | 15000 gallons | | | HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT295 | Equipment No. 363 Thermal Oxidizer No. 1 | | 6 MM BTU/hr | MeCl, CH4, Air, CH2O, HCl | MeCl, CH4, Air, CH2O, HCl | 8760 hr/yr (All Year) |
| EQT296 | Equipment No. 373B Thermal Oxidizer No. 2 | | 6 MM BTU/hr | MeCl, CH4, Air, CH2O, HCl | MeCl, CH4, Air, CH2O, HCl | 8760 hr/yr (All Year) |
| EQT297 | Equipment No. 880 Thermal Oxidizer No. 3 | | 3.5 MM BTU/hr | MeCl, CH4, Air, CH2O, HCl | MeCl, CH4, Air, CH2O, HCl | 8760 hr/yr (All Year) |
| EQT298 | Equipment No. 170 Thermal Oxidizer No. 4 | | 17 MM BTU/hr | MeCl, CH4, Air, CH2O, HCl | MeCl, CH4, Air, CH2O, HCl | 8760 hr/yr (All Year) |
| EQT299 | Equipment No. 325 Thermal Oxidizer No. 5 | | 17 MM BTU/hr | Water, NaOH, trace of Organics | Water, NaOH, trace of Organics | 8760 hr/yr (All Year) |
| EQT300 | Tank No. 127 A-D Waste Collection Tank | 2400 gallons | | Water, NaOH, trace of Organics | Water, NaOH, trace of Organics | 8760 hr/yr (All Year) |
| EQT301 | Tank No. 274 E-F Waste Collection Tank | 2500 gallons | | Water, NaOH, trace of Organics | Water, NaOH, trace of Organics | 8760 hr/yr (All Year) |
| EQT302 | Tank No. 472A G-H Waste Collection Tank | 2500 gallons | | Water, NaOH, trace of Organics | Water, NaOH, trace of Organics | 8760 hr/yr (All Year) |
| EQT303 | Tank No. 830 I-L Waste Collection Tank | 8000 gallons | | Water, NaOH, trace of Organics | Water, NaOH, trace of Organics | 8760 hr/yr (All Year) |
| EQT304 | Tank No. 601 M-O Waste Collection Tank | 8000 gallons | | Water, NaOH, trace of Organics | Water, NaOH, trace of Organics | 8760 hr/yr (All Year) |
| EQT305 | Tank No. 722 Bulk Waste Collection Tank | 1300 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT307 | Tank No. 510 A-D BCME Scrubber Hold Tank | 800 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT308 | Tank No. 290 E-F BCME Scrubber Hold Tank | 700 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT309 | Tank No. 490 G-H BCME Scrubber Hold Tank | 800 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT310 | Tank No. 188 I-L BCME Scrubber Hold Tank | 700 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT311 | Tank No. 308 M-O BCME Scrubber Hold Tank | 800 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT312 | Tank No. 511.1 A-D BCMÉ Hydrolysis Tank | 1000 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT313 | Tank No. 511.2 A-D BCMÉ Hydrolysis Tank | 1000 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT314 | Tank No. 282 E-F BCMÉ Hydrolysis Tank | 1000 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT315 | Tank No. 283 E-F BCMÉ Hydrolysis Tank | 1000 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT316 | Tank No. 482 G-H BCMÉ Hydrolysis Tank | 1000 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT317 | Tank No. 483 G-H BCMÉ Hydrolysis Tank | 1000 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT318 | Tank No. 191A 1-L BCMÉ Hydrolysis Tank | 1000 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT319 | Tank No. 192 I-L BCMÉ Hydrolysis Tank | 1000 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |
| EQT320 | Tank No. 311 M-O BCMÉ Hydrolysis Tank | 1000 gallons | | Water, HCl, CH2O, trace of Organics | Water, HCl, CH2O, trace of Organics | 8760 hr/yr (All Year) |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
Activity Number: PER20030007
Permit Number: 2574-V4
Air - Title V Regular Permit Renewal

Subject Item Inventory:

| ID | Description | Tank Volume | Max. Operating Rate | Normal Operating Rate | Contents | Operating Time |
|--------|--|---------------|---------------------|-----------------------|---|-----------------------|
| EQT321 | Tank No. 312 M-O BCM/E Hydrolysis Tank | 1000 gallons | | | Water, HCl, CH ₂ O, trace of Organics | 8760 hr/yr (All Year) |
| EQT322 | Tank No. 729 Acid Heel Tank No. 1 | 500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT323 | Tank No. 621 Acid Heel Tank No. 2 | 500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT324 | Tank No. 121 Acid Heel Tank No. 3 | 500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT325 | Tank No. 021 Acid Heel Tank No. 4 | 500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT326 | Tank No. 321 Acid Heel Tank No. 5 | 500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT327 | Tank No. 421 Acid Heel Tank No. 6 | 500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT328 | Tank No. 105 Acid Heel Tank No. 7 | 500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT329 | Tank No. 205 Acid Heel Tank No. 8 | 500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT330 | Tank No. 329 HCl Scrubber Tank No. 1 | 7500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT331 | Tank No. 633 HCl Scrubber Tank No. 2 | 7500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT332 | Tank No. 133 HCl Scrubber Tank No. 3 | 7500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT333 | Tank No. 033 HCl Scrubber Tank No. 4 | 7500 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT334 | Tank No. 333B HCl Scrubber Tank No. 5 | 15000 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT335 | Tank No. 113 HCl Scrubber Tank No. 6 | 15000 gallons | | | HCl, H ₃ PO ₃ , trace of Organics | 8760 hr/yr (All Year) |
| EQT336 | Tank No. 306 HCl Surge Tank No. 1 | 3000 gallons | | | HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT337 | Tank No. 139 HCl Surge Tank No. 3 | 2000 gallons | | | HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT338 | Tank No. 039 HCl Surge Tank No. 4 | 2000 gallons | | | HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT339 | Tank No. 339 HCl Surge Tank No. 5 | 3300 gallons | | | HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT340 | Tank No. 109 HCl Surge Tank No. 6 | 3300 gallons | | | HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT341 | Tank No. 751 A-D Centrifuge Washwater Tank | 3000 gallons | | | Water, trace of Organics | 8760 hr/yr (All Year) |
| EQT342 | Tank No. 374 A-D TO Quench Tank | 500 gallons | | | Water, HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT343 | Tank No. 364 E-F TO Quench Tank | 500 gallons | | | Water, HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT344 | Tank No. 883 G-H TO Quench Tank | 500 gallons | | | Water, HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT345 | Tank No. 171B I-L TO Quench Tank | 3300 gallons | | | Water, HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT346 | Tank No. 332 M-O TO Quench Tank | 3300 gallons | | | Water, HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT347 | Tank No. 580 TO Condensate Collection Tank | 100 gallons | | | Water, HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT348 | Tank No. 163 TO Condensate Collection Tank | 1800 gallons | | | Water, HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT349 | Tank No. 317 TO Condensate Collection Tank | 1800 gallons | | | Water, HCl, trace of Organics | 8760 hr/yr (All Year) |
| EQT350 | Tank No. 462 Reslurry Tank I | 13300 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT351 | Tank No. 472B Reslurry Tank J | 13300 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT352 | Tank No. 562A Reslurry Tank L | 13300 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT353 | Tank No. 191B Reslurry Tank M | 5000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT354 | Tank No. 291 Reslurry Tank N | 5000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT357 | Tank No. 360 Basket Wash Surge Tank | 20000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT358 | Tank No. 597 Basket Wash Collection Tank | 16000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

| ID | Description | Tank Volume | Max. Operating Rate | Normal Operating Rate | Contents | Operating Time |
|--------|---|---------------|---------------------|-----------------------|-------------------------------|-----------------------|
| EQT359 | Tank No. 181 Basket Wash Collection Tank | 16000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT360 | Tank No. 265 Off Spec Tank | 10000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT362 | Tank No. 340 CT Slurry Storage Tank | 17000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT363 | Tank No. 476 CT Slurry Storage Tank | 27300 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT364 | Tank No. 686 CT Slurry Storage Tank | 27300 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT366 | Tank No. 706 Intermediate Feed Tank | 17000 gallons | | | Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT367 | Tank No. 176 Intermediate Feed Tank | 16000 gallons | | | Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT371 | Tank No. 517 A-D Emergency Vent Tank | 7500 gallons | | | Normally Water | 8760 hr/yr (All Year) |
| EQT372 | Tank No. 126 E-F Emergency Vent Tank | 7500 gallons | | | Normally Water | 8760 hr/yr (All Year) |
| EQT373 | Tank No. 026 G-H Emergency Vent Tank | 7500 gallons | | | Normally Water | 8760 hr/yr (All Year) |
| EQT374 | Tank No. 818 I-L Emergency Vent Tank | 20000 gallons | | | Normally Water | 8760 hr/yr (All Year) |
| EQT375 | Tank No. 304 M-O Emergency Vent Tank | 20000 gallons | | | Normally Water | 8760 hr/yr (All Year) |
| EQT376 | Tank No. 562B Reslurry Tank E | 7000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT377 | Tank No. 572 Reslurry Tank E | 7000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT378 | Tank No. 762A Reslurry Tank F | 7000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT379 | Tank No. 772A Reslurry Tank F | 7000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT380 | Tank No. 062 Reslurry Tank G | 7000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT381 | Tank No. 072 Reslurry Tank G | 7000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT382 | Tank No. 862 Reslurry Tank H | 7000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT383 | Tank No. 872 Reslurry Tank H | 7000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT384 | Tank No. 672 Reslurry Tank | 2000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT385 | Tank No. 762B Reslurry Tank | 2500 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT386 | Tank No. 772B Reslurry Tank | 2500 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT387 | Tank No. 117 Sump Collection Tank | 30000 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT388 | Tank No. 797 Basket Wash Collection Tank | 600 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT389 | Tank No. 142 Basket Wash Collection Tank | 7500 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT390 | Tank No. 042 Basket Wash Collection Tank | 7500 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT391 | Tank No. 717 Solids Recovery Tank | 8900 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT392 | Tank No. 815 Hydrolyzer Quench Tank | 10100 gallons | | | Normally Empty | 8760 hr/yr (All Year) |
| EQT393 | Tank No. 301 Hydrolyzer Quench Tank | 10100 gallons | | | Normally Empty | 8760 hr/yr (All Year) |
| EQT395 | Tank No. 505 I-L Centrifuge Siphon Tank | 100 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT398 | Tank No. 705 Bulk Centrifuge Siphon Tank | 100 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT399 | Tank No. 610 L Centrifuge Overflow Tank | 800 gallons | | | Water, Gl, trace of Organics | 8760 hr/yr (All Year) |
| EQT400 | Tank No. 668 M-O Centrifuge Overflow Tank | 800 gallons | | | DSIDA, PCI3, HCl, H3PO3, NaCl | 8760 hr/yr (All Year) |
| EQT402 | Vessel No. 726 Hydrolyzer No. 1 | | | | DSIDA, PCI3, HCl, H3PO3, NaCl | 8760 hr/yr (All Year) |
| EQT403 | Vessel No. 618 Hydrolyzer No. 2 | | | | DSIDA, PCI3, HCl, H3PO3, NaCl | 8760 hr/yr (All Year) |
| EQT404 | Vessel No. 118 Hydrolyzer No. 3 | | | | DSIDA, PCI3, HCl, H3PO3, NaCl | 8760 hr/yr (All Year) |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

| ID | Description | Tank Volume | Max. Operating Rate | Normal Operating Rate | Contents | Operating Time |
|--------|---------------------------------|-------------|---------------------|-----------------------|-------------------------------------|-----------------------|
| EQT405 | Vessel No. 018 Hydrolyzer No. 4 | | | | DSIDA, PC13, HCl, H3PO3, NaCl | 8760 hr/yr (All Year) |
| EQT406 | Vessel No. 318 Hydrolyzer No. 5 | | | | DSIDA, PC13, HCl, H3PO3, NaCl | 8760 hr/yr (All Year) |
| EQT407 | Vessel No. 418 Hydrolyzer No. 6 | | | | DSIDA, PC13, HCl, H3PO3, NaCl | 8760 hr/yr (All Year) |
| EQT408 | Vessel No. 102 Hydrolyzer No. 7 | | | | DSIDA, PC13, HCl, H3PO3, NaCl | 8760 hr/yr (All Year) |
| EQT409 | Vessel No. 202 Hydrolyzer No. 8 | | | | DSIDA, PC13, HCl, H3PO3, NaCl | 8760 hr/yr (All Year) |
| EQT410 | Vessel No. 735 PM Reactor A | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT411 | Vessel No. 738 PM Reactor B | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT412 | Vessel No. 645 PM Reactor C | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT413 | Vessel No. 845A PM Reactor D | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT414 | Vessel No. 145 PM Reactor E | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT415 | Vessel No. 245 PM Reactor F | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT416 | Vessel No. 045 PM Reactor G | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT417 | Vessel No. 845B PM Reactor H | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT418 | Vessel No. 345 PM Reactor I | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT419 | Vessel No. 945 PM Reactor J | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT420 | Vessel No. 445 PM Reactor K | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT421 | Vessel No. 545 PM Reactor L | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT422 | Vessel No. 151 PM Reactor M | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT423 | Vessel No. 251 PM Reactor N | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT424 | Vessel No. 351 PM Reactor O | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT426 | Vessel No. 747 Crystallizer A | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT427 | Vessel No. 745 Crystallizer B | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT428 | Vessel No. 650 Crystallizer C | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT429 | Vessel No. 850A Crystallizer D | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT430 | Vessel No. 550A Crystallizer E | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

| ID | Description | Tank Volume | Max. Operating Rate | Normal Operating Rate | Contents | Operating Time |
|--------|---------------------------------|-------------|---------------------|-----------------------|--|-----------------------|
| EQT431 | Vessel No. 750 Crystallizer F | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT432 | Vessel No. 050 Crystallizer G | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT433 | Vessel No. 850B Crystallizer H | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT434 | Vessel No. 350 Crystallizer I | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT435 | Vessel No. 950 Crystallizer J | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT436 | Vessel No. 450 Crystallizer K | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT437 | Vessel No. 550B Crystallizer L | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT438 | Vessel No. 161 Crystallizer M | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT439 | Vessel No. 261 Crystallizer N | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT440 | Vessel No. 361 Crystallizer O | | | | DSIDA, CH2O, HCl, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT442 | Equipment No. 763 Centrifuge A | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT443 | Equipment No. 773 Centrifuge B | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT444 | Equipment No. 657A Centrifuge C | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT445 | Equipment No. 857A Centrifuge D | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT446 | Equipment No. 557A Centrifuge E | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT447 | Equipment No. 757A Centrifuge F | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT448 | Equipment No. 057 Centrifuge G | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT449 | Equipment No. 857B Centrifuge H | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT450 | Equipment No. 357 Centrifuge I | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT451 | Equipment No. 957 Centrifuge J | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT452 | Equipment No. 457 Centrifuge K | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT453 | Equipment No. 557B Centrifuge L | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT454 | Equipment No. 173 Centrifuge M | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT455 | Equipment No. 174 Centrifuge N | | | | DSIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

| ID | Description | Tank Volume | Max. Operating Rate | Normal Operating Rate | Contents | Operating Time |
|--------|---|--------------|---------------------|-----------------------|--|-----------------------|
| EQT456 | Equipment No. 273 Centrifuge O | | | | DSDIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT457 | Equipment No. 373A Centrifuge P | | | | DSDIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT460 | Equipment No. 710A Bulk Centrifuge No. 1 | | | | DSDIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT461 | Equipment No. 720 Bulk Centrifuge No. 2 | | | | DSDIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT462 | Equipment No. 780 Bulk Centrifuge No. 3 | | | | DSDIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT463 | Equipment No. 657B Bulk Centrifuge No. 4 | | | | DSDIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT464 | Equipment No. 790 Bulk Centrifuge No. 5 | | | | DSDIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT465 | Equipment No. 757B Bulk Centrifuge No. 6 | | | | DSDIDA, CH2O, HCl, GI, H3PO3, NaCl, NaOH | 8760 hr/yr (All Year) |
| EQT466 | Equipment No. 710B Flash Dryer A | | | 4 MM BTU/hr | GI, CH4, Air, CH2O, HCl | 8760 hr/yr (All Year) |
| EQT467 | Equipment No. 410 Flash Dryer B | | | 3 MM BTU/hr | GI, CH4, Air, CH2O, HCl | 8760 hr/yr (All Year) |
| EQT468 | Equipment No. 665 Flash Dryer C | | | 3 MM BTU/hr | GI, CH4, Air, CH2O, HCl | 8760 hr/yr (All Year) |
| EQT469 | Equipment No. 865 Flash Dryer D | | | 3 MM BTU/hr | GI, CH4, Air, CH2O, HCl | 8760 hr/yr (All Year) |
| EQT559 | Tank No. 860 Resurry Tank D | 2000 gallons | | | Water, GI, trace of Organics | 8760 hr/yr (All Year) |
| EQT560 | Tank No. 660 Resurry Tank C | 2000 gallons | | | Water, GI, trace of Organics | 8760 hr/yr (All Year) |
| FUG006 | 42-968 Fugitive Emissions from Glyphosate Plant | | | | | 8760 hr/yr (All Year) |

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|--------------|---|
| GRP024 | List A Tanks | EQT251 Tank No. 101 Formain Storage Tank |
| GRP024 | List A Tanks | EQT252 Tank No. 102 Formain Storage Tank |
| GRP024 | List A Tanks | EQT253 Tank No. 201 Formain Storage Tank |
| GRP024 | List A Tanks | EQT254 Tank No. 203 Formain Storage Tank |
| GRP024 | List A Tanks | EQT255 Tank No. 692 Formain Storage Tank |
| GRP024 | List A Tanks | EQT256 Tank No. 375 DSDIDA Day Tank |
| GRP024 | List A Tanks | EQT257 Tank No. 376 DSDIDA Day Tank |
| GRP024 | List A Tanks | EQT258 Tank No. 680 DSDIDA Day Tank |
| GRP025 | List B Tanks | EQT260 Tank No. 761 Centrifuge Feed Tank A |
| GRP025 | List B Tanks | EQT261 Tank No. 771 Centrifuge Feed Tank B |
| GRP025 | List B Tanks | EQT262 Tank No. 665 Centrifuge Feed Tank C |
| GRP025 | List B Tanks | EQT263 Tank No. 855A Centrifuge Feed Tank D |
| GRP025 | List B Tanks | EQT264 Tank No. 555A Centrifuge Feed Tank E |
| GRP025 | List B Tanks | EQT265 Tank No. 755A Centrifuge Feed Tank F |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|--------------|--|
| GRP025 | List B Tanks | EQT266 Tank No. 055 Centrifuge Feed Tank G |
| GRP025 | List B Tanks | EQT267 Tank No. 855B Centrifuge Feed Tank H |
| GRP025 | List B Tanks | EQT268 Tank No. 355 Centrifuge Feed Tank I |
| GRP025 | List B Tanks | EQT269 Tank No. 455 Centrifuge Feed Tank J |
| GRP025 | List B Tanks | EQT270 Tank No. 555B Centrifuge Feed Tank K |
| GRP025 | List B Tanks | EQT271 Tank No. 955 Centrifuge Feed Tank L |
| GRP025 | List B Tanks | EQT272 Tank No. 171B Centrifuge Feed Tank M |
| GRP025 | List B Tanks | EQT273 Tank No. 175 Centrifuge Feed Tank N |
| GRP025 | List B Tanks | EQT274 Tank No. 271 Centrifuge Feed Tank O |
| GRP025 | List B Tanks | EQT275 Tank No. 371 Centrifuge Feed Tank P |
| GRP025 | List B Tanks | EQT278 Tank No. 701 Bulk Centrifuge Feed Tank 1 |
| GRP025 | List B Tanks | EQT279 Tank No. 733 Bulk Centrifuge Feed Tank 2 |
| GRP025 | List B Tanks | EQT280 Tank No. 781 Bulk Centrifuge Feed Tank 3 |
| GRP025 | List B Tanks | EQT281 Tank No. 655 Bulk Centrifuge Feed Tank 4 |
| GRP025 | List B Tanks | EQT282 Tank No. 808 Bulk Centrifuge Feed Tank 5 |
| GRP025 | List B Tanks | EQT283 Tank No. 755B Bulk Centrifuge Feed Tank 6 |
| GRP025 | List B Tanks | EQT284 Tank No. 150 A-D Centrate Receiver |
| GRP025 | List B Tanks | EQT285 Tank No. 460 E-F Centrate Receiver |
| GRP025 | List B Tanks | EQT286 Tank No. 260 G-H Centrate Receiver |
| GRP025 | List B Tanks | EQT287 Tank No. 660 I-L Centrate Receiver |
| GRP025 | List B Tanks | EQT288 Tank No. 187 M-O Centrate Receiver |
| GRP025 | List B Tanks | EQT289 Tank No. 713 Bulk Centrate Receiver |
| GRP025 | List B Tanks | EQT291 Tank No. 301 HCl Storage Tank |
| GRP025 | List B Tanks | EQT292 Tank No. 302 HCl Storage Tank |
| GRP025 | List B Tanks | EQT293 Tank No. 333A HCl Storage Tank |
| GRP025 | List B Tanks | EQT300 Tank No. 127 A-D Waste Collection Tank |
| GRP025 | List B Tanks | EQT301 Tank No. 274 E-F Waste Collection Tank |
| GRP025 | List B Tanks | EQT302 Tank No. 472A G-H Waste Collection Tank |
| GRP025 | List B Tanks | EQT303 Tank No. 830 I-L Waste Collection Tank |
| GRP025 | List B Tanks | EQT304 Tank No. 601 M-O Waste Collection Tank |
| GRP025 | List B Tanks | EQT305 Tank No. 722 Bulk Waste Collection Tank |
| GRP025 | List B Tanks | EQT307 Tank No. 510 A-D BCME Scrubber Hold Tank |
| GRP025 | List B Tanks | EQT308 Tank No. 290 E-F BCME Scrubber Hold Tank |
| GRP025 | List B Tanks | EQT309 Tank No. 490 G-H BCME Scrubber Hold Tank |
| GRP025 | List B Tanks | EQT310 Tank No. 188 I-L BCME Scrubber Hold Tank |
| GRP025 | List B Tanks | EQT311 Tank No. 308 M-O BCME Scrubber Hold Tank |
| GRP025 | List B Tanks | EQT312 Tank No. 511.1 A-D BCME Hydrolysis Tank |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|--------------|---|
| GRP025 | List B Tanks | EQT313 Tank No. 511 2 A-D BCME Hydrolysis Tank |
| GRP025 | List B Tanks | EQT314 Tank No. 282 E-F BCME Hydrolysis Tank |
| GRP025 | List B Tanks | EQT315 Tank No. 283 E-F BCME Hydrolysis Tank |
| GRP025 | List B Tanks | EQT316 Tank No. 482 G-H BCME Hydrolysis Tank |
| GRP025 | List B Tanks | EQT317 Tank No. 483 G-H BCME Hydrolysis Tank |
| GRP025 | List B Tanks | EQT318 Tank No. 191A I-L BCME Hydrolysis Tank |
| GRP025 | List B Tanks | EQT319 Tank No. 192 I-L BCME Hydrolysis Tank |
| GRP025 | List B Tanks | EQT320 Tank No. 311 M-O BCME Hydrolysis Tank |
| GRP025 | List B Tanks | EQT321 Tank No. 312 M-O BCME Hydrolysis Tank |
| GRP026 | List C Tanks | EQT322 Tank No. 729 Acid Heel Tank No. 1 |
| GRP026 | List C Tanks | EQT323 Tank No. 621 Acid Heel Tank No. 2 |
| GRP026 | List C Tanks | EQT324 Tank No. 121 Acid Heel Tank No. 3 |
| GRP026 | List C Tanks | EQT325 Tank No. 021 Acid Heel Tank No. 4 |
| GRP026 | List C Tanks | EQT326 Tank No. 321 Acid Heel Tank No. 5 |
| GRP026 | List C Tanks | EQT327 Tank No. 421 Acid Heel Tank No. 6 |
| GRP026 | List C Tanks | EQT328 Tank No. 105 Acid Heel Tank No. 7 |
| GRP026 | List C Tanks | EQT329 Tank No. 205 Acid Heel Tank No. 8 |
| GRP026 | List C Tanks | EQT330 Tank No. 329 HCl Scrubber Tank No. 1 |
| GRP026 | List C Tanks | EQT331 Tank No. 633 HCl Scrubber Tank No. 2 |
| GRP026 | List C Tanks | EQT332 Tank No. 133 HCl Scrubber Tank No. 3 |
| GRP026 | List C Tanks | EQT333 Tank No. 033 HCl Scrubber Tank No. 4 |
| GRP026 | List C Tanks | EQT334 Tank No. 333B HCl Scrubber Tank No. 5 |
| GRP026 | List C Tanks | EQT335 Tank No. 113 HCl Scrubber Tank No. 6 |
| GRP026 | List C Tanks | EQT336 Tank No. 306 HCl Surge Tank No. 1 |
| GRP026 | List C Tanks | EQT337 Tank No. 139 HCl Surge Tank No. 3 |
| GRP026 | List C Tanks | EQT338 Tank No. 039 HCl Surge Tank No. 4 |
| GRP026 | List C Tanks | EQT339 Tank No. 339 HCl Surge Tank No. 5 |
| GRP026 | List C Tanks | EQT340 Tank No. 109 HCl Surge Tank No. 6 |
| GRP026 | List C Tanks | EQT341 Tank No. 751 A-D Centrifuge Washwater Tank |
| GRP026 | List C Tanks | EQT342 Tank No. 374 A-D TO Quench Tank |
| GRP026 | List C Tanks | EQT343 Tank No. 364 E-F TO Quench Tank |
| GRP026 | List C Tanks | EQT344 Tank No. 883 G-H TO Quench Tank |
| GRP026 | List C Tanks | EQT345 Tank No. 171B I-L TO Quench Tank |
| GRP026 | List C Tanks | EQT346 Tank No. 332 M-O TO Quench Tank |
| GRP026 | List C Tanks | EQT347 Tank No. 580 TO Condensate Collection Tank |
| GRP026 | List C Tanks | EQT348 Tank No. 163 TO Condensate Collection Tank |
| GRP026 | List C Tanks | EQT349 Tank No. 317 TO Condensate Collection Tank |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20030007

Permit Number: 2574-V4

Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|--------------|---|
| GRP027 | List D Tanks | EQT350 Tank No. 462 Reslurry Tank I |
| GRP027 | List D Tanks | EQT351 Tank No. 472B Reslurry Tank J |
| GRP027 | List D Tanks | EQT352 Tank No. 562A Reslurry Tank L |
| GRP027 | List D Tanks | EQT353 Tank No. 191B Reslurry Tank M |
| GRP027 | List D Tanks | EQT354 Tank No. 291 Reslurry Tank N |
| GRP027 | List D Tanks | EQT357 Tank No. 360 Basket Wash Surge Tank |
| GRP027 | List D Tanks | EQT358 Tank No. 597 Basket Wash Collection Tank |
| GRP027 | List D Tanks | EQT359 Tank No. 181 Basket Wash Collection Tank |
| GRP027 | List D Tanks | EQT360 Tank No. 265 Off Spec Tank |
| GRP027 | List D Tanks | EQT362 Tank No. 340 CT Slurry Storage Tank |
| GRP027 | List D Tanks | EQT363 Tank No. 476 CT Slurry Storage Tank |
| GRP027 | List D Tanks | EQT364 Tank No. 686 CT Slurry Storage Tank |
| GRP027 | List D Tanks | EQT366 Tank No. 706 Intermediate Feed Tank |
| GRP027 | List D Tanks | EQT367 Tank No. 176 Intermediate Feed Tank |
| GRP027 | List D Tanks | EQT371 Tank No. 517 A-D Emergency Vent Tank |
| GRP027 | List D Tanks | EQT372 Tank No. 126 E-F Emergency Vent Tank |
| GRP027 | List D Tanks | EQT373 Tank No. 026 G-H Emergency Vent Tank |
| GRP027 | List D Tanks | EQT374 Tank No. 818 I-L Emergency Vent Tank |
| GRP027 | List D Tanks | EQT375 Tank No. 304 M-O Emergency Vent Tank |
| GRP027 | List D Tanks | EQT376 Tank No. 562B Reslurry Tank E |
| GRP027 | List D Tanks | EQT377 Tank No. 572 Reslurry Tank F |
| GRP027 | List D Tanks | EQT378 Tank No. 762A Reslurry Tank F |
| GRP027 | List D Tanks | EQT379 Tank No. 772A Reslurry Tank F |
| GRP027 | List D Tanks | EQT380 Tank No. 062 Reslurry Tank G |
| GRP027 | List D Tanks | EQT381 Tank No. 072 Reslurry Tank G |
| GRP027 | List D Tanks | EQT382 Tank No. 862 Reslurry Tank H |
| GRP027 | List D Tanks | EQT383 Tank No. 872 Reslurry Tank H |
| GRP027 | List D Tanks | EQT384 Tank No. 672 Reslurry Tank |
| GRP027 | List D Tanks | EQT385 Tank No. 762B Reslurry Tank |
| GRP027 | List D Tanks | EQT386 Tank No. 772B Reslurry Tank |
| GRP027 | List D Tanks | EQT387 Tank No. 117 Sump Collection Tank |
| GRP027 | List D Tanks | EQT388 Tank No. 797 Basket Wash Collection Tank |
| GRP027 | List D Tanks | EQT389 Tank No. 142 Basket Wash Collection Tank |
| GRP027 | List D Tanks | EQT390 Tank No. 042 Basket Wash Collection Tank |
| GRP027 | List D Tanks | EQT391 Tank No. 717 Solids Recovery Tank |
| GRP027 | List D Tanks | EQT392 Tank No. 815 Hydrolyzer Quench Tank |
| GRP027 | List D Tanks | EQT393 Tank No. 301 Hydrolyzer Quench Tank |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|--------------|--|
| GRP027 | List D Tanks | EQT395 Tank No. 505 I-L Centrifuge Siphon Tank |
| GRP027 | List D Tanks | EQT398 Tank No. 705 Bulk Centrifuge Siphon Tank |
| GRP027 | List D Tanks | EQT399 Tank No. 610 L Centrifuge Overflow Tank |
| GRP027 | List D Tanks | EQT400 Tank No. 668 M-O Centrifuge Overflow Tank |
| GRP027 | List D Tanks | EQT559 Tank No. 860 Resurry Tank D |
| GRP027 | List D Tanks | EQT560 Tank No. 660 Resurry Tank C |
| GRP028 | GI Unit | EQT224 1-74 Fume Scrubber A |
| GRP028 | GI Unit | EQT225 41-77 Fume Scrubber B |
| GRP028 | GI Unit | EQT226 1-88 Fume Scrubber C |
| GRP028 | GI Unit | EQT227 1-89 Fume Scrubber D |
| GRP028 | GI Unit | EQT228 8-90 Process Scrubber E |
| GRP028 | GI Unit | EQT229 1-94 Process Scrubber G |
| GRP028 | GI Unit | EQT230 3-95 GI Centrifuge Scrubber |
| GRP028 | GI Unit | EQT231 20-95 Fume Scrubber I |
| GRP028 | GI Unit | EQT232 20-98 Process Scrubber M |
| GRP028 | GI Unit | EQT233 13-96 Formaldehyde Tank Scrubber |
| GRP028 | GI Unit | EQT235 4-86 PIA Warehouse Silo 787 Baghouse |
| GRP028 | GI Unit | EQT236 9-90 PIA Warehouse Silo 160 Baghouse |
| GRP028 | GI Unit | EQT237 5-86 DSIDA Storage Tank No. 1 |
| GRP028 | GI Unit | EQT238 2-88 DSIDA Storage Tank No. 2 |
| GRP028 | GI Unit | EQT239 7-90 DSIDA Storage Tank No. 3 |
| GRP028 | GI Unit | EQT240 24-95 DSIDA Storage Tank No. 4 |
| GRP028 | GI Unit | EQT241 37-95 DSIDA Storage Tank No. 5 |
| GRP028 | GI Unit | EQT242 23-98 DSIDA Storage Tank No. 6 |
| GRP028 | GI Unit | EQT243 7-06 CT Overheads Tank 1 |
| GRP028 | GI Unit | EQT244 8-06 CT Overheads Tank 2 |
| GRP028 | GI Unit | EQT245 24-98 GIH Cooling Tower |
| GRP028 | GI Unit | EQT246 25-98 CID Cooling Tower |
| GRP028 | GI Unit | EQT247 26-98 E/F Cooling Tower |
| GRP028 | GI Unit | EQT248 28-98 I/J/K/L Cooling Tower |
| GRP028 | GI Unit | EQT249 29-98 MN/O Cooling Tower |
| GRP028 | GI Unit | EQT251 Tank No. 101 Formalin Storage Tank |
| GRP028 | GI Unit | EQT252 Tank No. 102 Formalin Storage Tank |
| GRP028 | GI Unit | EQT253 Tank No. 201 Formalin Storage Tank |
| GRP028 | GI Unit | EQT254 Tank No. 203 Formalin Storage Tank |
| GRP028 | GI Unit | EQT255 Tank No. 692 Formalin Storage Tank |
| GRP028 | GI Unit | EQT256 Tank No. 375 DSIDA Day Tank |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|-------------|--|
| GRP028 | GI Unit | EQT257 Tank No. 376 DSIDA Day Tank |
| GRP028 | GI Unit | EQT258 Tank No. 680 DSIDA Day Tank |
| GRP028 | GI Unit | EQT260 Tank No. 761 Centrifuge Feed Tank A |
| GRP028 | GI Unit | EQT261 Tank No. 771 Centrifuge Feed Tank B |
| GRP028 | GI Unit | EQT262 Tank No. 665 Centrifuge Feed Tank C |
| GRP028 | GI Unit | EQT263 Tank No. 855A Centrifuge Feed Tank D |
| GRP028 | GI Unit | EQT264 Tank No. 555A Centrifuge Feed Tank E |
| GRP028 | GI Unit | EQT265 Tank No. 755A Centrifuge Feed Tank F |
| GRP028 | GI Unit | EQT266 Tank No. 055 Centrifuge Feed Tank G |
| GRP028 | GI Unit | EQT267 Tank No. 855B Centrifuge Feed Tank H |
| GRP028 | GI Unit | EQT268 Tank No. 355 Centrifuge Feed Tank I |
| GRP028 | GI Unit | EQT269 Tank No. 455 Centrifuge Feed Tank J |
| GRP028 | GI Unit | EQT270 Tank No. 555B Centrifuge Feed Tank K |
| GRP028 | GI Unit | EQT271 Tank No. 955 Centrifuge Feed Tank L |
| GRP028 | GI Unit | EQT272 Tank No. 171B Centrifuge Feed Tank M |
| GRP028 | GI Unit | EQT273 Tank No. 175 Centrifuge Feed Tank N |
| GRP028 | GI Unit | EQT274 Tank No. 271 Centrifuge Feed Tank O |
| GRP028 | GI Unit | EQT275 Tank No. 371 Centrifuge Feed Tank P |
| GRP028 | GI Unit | EQT276 Tank No. 701 Bulk Centrifuge Feed Tank 1 |
| GRP028 | GI Unit | EQT279 Tank No. 733 Bulk Centrifuge Feed Tank 2 |
| GRP028 | GI Unit | EQT280 Tank No. 781 Bulk Centrifuge Feed Tank 3 |
| GRP028 | GI Unit | EQT281 Tank No. 655 Bulk Centrifuge Feed Tank 4 |
| GRP028 | GI Unit | EQT282 Tank No. 808 Bulk Centrifuge Feed Tank 5 |
| GRP028 | GI Unit | EQT283 Tank No. 755B Bulk Centrifuge Feed Tank 6 |
| GRP028 | GI Unit | EQT284 Tank No. 150 A-D Centrate Receiver |
| GRP028 | GI Unit | EQT285 Tank No. 460 E-F Centrate Receiver |
| GRP028 | GI Unit | EQT286 Tank No. 260 G-H Centrate Receiver |
| GRP028 | GI Unit | EQT287 Tank No. 660 I-L Centrate Receiver |
| GRP028 | GI Unit | EQT288 Tank No. 187 M-O Centrate Receiver |
| GRP028 | GI Unit | EQT289 Tank No. 713 Bulk Centrate Receiver |
| GRP028 | GI Unit | EQT291 Tank No. 301 HC1 Storage Tank |
| GRP028 | GI Unit | EQT292 Tank No. 302 HC1 Storage Tank |
| GRP028 | GI Unit | EQT293 Tank No. 333A HC1 Storage Tank |
| GRP028 | GI Unit | EQT295 Equipment No. 363 Thermal Oxidizer No. 1 |
| GRP028 | GI Unit | EQT296 Equipment No. 373B Thermal Oxidizer No. 2 |
| GRP028 | GI Unit | EQT297 Equipment No. 880 Thermal Oxidizer No. 3 |
| GRP028 | GI Unit | EQT298 Equipment No. 170 Thermal Oxidizer No. 4 |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|-------------|---|
| GRP028 | GI Unit | EQT299 Equipment No. 325 Thermal Oxidizer No. 5 |
| GRP028 | GI Unit | EQT300 Tank No. 127 A-D Waste Collection Tank |
| GRP028 | GI Unit | EQT301 Tank No. 274 E-F Waste Collection Tank |
| GRP028 | GI Unit | EQT302 Tank No. 472A G-H Waste Collection Tank |
| GRP028 | GI Unit | EQT303 Tank No. 830 I-L Waste Collection Tank |
| GRP028 | GI Unit | EQT304 Tank No. 601 M-O Waste Collection Tank |
| GRP028 | GI Unit | EQT305 Tank No. 722 Bulk Waste Collection Tank |
| GRP028 | GI Unit | EQT307 Tank No. 510 A-D BCME Scrubber Hold Tank |
| GRP028 | GI Unit | EQT308 Tank No. 290 E-F BCME Scrubber Hold Tank |
| GRP028 | GI Unit | EQT309 Tank No. 190 G-H BCME Scrubber Hold Tank |
| GRP028 | GI Unit | EQT310 Tank No. 188 I-L BCME Scrubber Hold Tank |
| GRP028 | GI Unit | EQT311 Tank No. 308 M-O BCME Scrubber Hold Tank |
| GRP028 | GI Unit | EQT312 Tank No. 511.1 A-D BCME Hydrolysis Tank |
| GRP028 | GI Unit | EQT313 Tank No. 511.2 A-D BCME Hydrolysis Tank |
| GRP028 | GI Unit | EQT314 Tank No. 282 E-F BCME Hydrolysis Tank |
| GRP028 | GI Unit | EQT315 Tank No. 283 E-F BCME Hydrolysis Tank |
| GRP028 | GI Unit | EQT316 Tank No. 482 G-H BCME Hydrolysis Tank |
| GRP028 | GI Unit | EQT317 Tank No. 483 G-H BCME Hydrolysis Tank |
| GRP028 | GI Unit | EQT318 Tank No. 191A I-L BCME Hydrolysis Tank |
| GRP028 | GI Unit | EQT319 Tank No. 192 I-L BCME Hydrolysis Tank |
| GRP028 | GI Unit | EQT320 Tank No. 311 M-O BCME Hydrolysis Tank |
| GRP028 | GI Unit | EQT321 Tank No. 312 M-O BCME Hydrolysis Tank |
| GRP028 | GI Unit | EQT322 Tank No. 729 Acid Heel Tank No. 1 |
| GRP028 | GI Unit | EQT323 Tank No. 621 Acid Heel Tank No. 2 |
| GRP028 | GI Unit | EQT324 Tank No. 121 Acid Heel Tank No. 3 |
| GRP028 | GI Unit | EQT325 Tank No. 021 Acid Heel Tank No. 4 |
| GRP028 | GI Unit | EQT326 Tank No. 321 Acid Heel Tank No. 5 |
| GRP028 | GI Unit | EQT327 Tank No. 421 Acid Heel Tank No. 6 |
| GRP028 | GI Unit | EQT328 Tank No. 105 Acid Heel Tank No. 7 |
| GRP028 | GI Unit | EQT329 Tank No. 205 Acid Heel Tank No. 8 |
| GRP028 | GI Unit | EQT330 Tank No. 329 HCl Scrubber Tank No. 1 |
| GRP028 | GI Unit | EQT331 Tank No. 633 HCl Scrubber Tank No. 2 |
| GRP028 | GI Unit | EQT332 Tank No. 133 HCl Scrubber Tank No. 3 |
| GRP028 | GI Unit | EQT333 Tank No. 033 HCl Scrubber Tank No. 4 |
| GRP028 | GI Unit | EQT334 Tank No. 333B HCl Scrubber Tank No. 5 |
| GRP028 | GI Unit | EQT335 Tank No. 113 HCl Scrubber Tank No. 6 |
| GRP028 | GI Unit | EQT336 Tank No. 306 HCl Surge Tank No. 1 |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER2003007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|-------------|---|
| GRP028 | GI Unit | EQT337 Tank No. 139 HCl Surge Tank No. 3 |
| GRP028 | GI Unit | EQT338 Tank No. 039 HCl Surge Tank No. 4 |
| GRP028 | GI Unit | EQT339 Tank No. 339 HCl Surge Tank No. 5 |
| GRP028 | GI Unit | EQT340 Tank No. 109 HCl Surge Tank No. 6 |
| GRP028 | GI Unit | EQT341 Tank No. 751 A-D Centrifuge Washwater Tank |
| GRP028 | GI Unit | EQT342 Tank No. 374 A-D TO Quench Tank |
| GRP028 | GI Unit | EQT343 Tank No. 364 E-F TO Quench Tank |
| GRP028 | GI Unit | EQT344 Tank No. 883 G-H TO Quench Tank |
| GRP028 | GI Unit | EQT345 Tank No. 171B I-L TO Quench Tank |
| GRP028 | GI Unit | EQT346 Tank No. 332 M-O TO Quench Tank |
| GRP028 | GI Unit | EQT347 Tank No. 580 TO Condensate Collection Tank |
| GRP028 | GI Unit | EQT348 Tank No. 163 TO Condensate Collection Tank |
| GRP028 | GI Unit | EQT349 Tank No. 317 TO Condensate Collection Tank |
| GRP028 | GI Unit | EQT350 Tank No. 462 Reslurry Tank I |
| GRP028 | GI Unit | EQT351 Tank No. 472B Reslurry Tank J |
| GRP028 | GI Unit | EQT352 Tank No. 562A Reslurry Tank L |
| GRP028 | GI Unit | EQT353 Tank No. 191B Reslurry Tank M |
| GRP028 | GI Unit | EQT354 Tank No. 291 Reslurry Tank N |
| GRP028 | GI Unit | EQT357 Tank No. 360 Basket Wash Surge Tank |
| GRP028 | GI Unit | EQT358 Tank No. 597 Basket Wash Collection Tank |
| GRP028 | GI Unit | EQT359 Tank No. 181 Basket Wash Collection Tank |
| GRP028 | GI Unit | EQT360 Tank No. 265 Off Spec Tank |
| GRP028 | GI Unit | EQT362 Tank No. 340 CT Slurry Storage Tank |
| GRP028 | GI Unit | EQT363 Tank No. 476 CT Slurry Storage Tank |
| GRP028 | GI Unit | EQT364 Tank No. 686 CT Slurry Storage Tank |
| GRP028 | GI Unit | EQT366 Tank No. 706 Intermediate Feed Tank |
| GRP028 | GI Unit | EQT367 Tank No. 176 Intermediate Feed Tank |
| GRP028 | GI Unit | EQT371 Tank No. 517 A-D Emergency Vent Tank |
| GRP028 | GI Unit | EQT372 Tank No. 126 E-F Emergency Vent Tank |
| GRP028 | GI Unit | EQT373 Tank No. 026 G-H Emergency Vent Tank |
| GRP028 | GI Unit | EQT374 Tank No. 818 I-L Emergency Vent Tank |
| GRP028 | GI Unit | EQT375 Tank No. 304 M-O Emergency Vent Tank |
| GRP028 | GI Unit | EQT376 Tank No. 562B Reslurry Tank E |
| GRP028 | GI Unit | EQT377 Tank No. 572 Reslurry Tank E |
| GRP028 | GI Unit | EQT378 Tank No. 762A Reslurry Tank F |
| GRP028 | GI Unit | EQT379 Tank No. 772A Reslurry Tank F |
| GRP028 | GI Unit | EQT380 Tank No. 062 Reslurry Tank G |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|-------------|--|
| GRP028 | GI Unit | EQT381 Tank No. 072 Reslurry Tank G |
| GRP028 | GI Unit | EQT382 Tank No. 862 Reslurry Tank H |
| GRP028 | GI Unit | EQT383 Tank No. 872 Reslurry Tank H |
| GRP028 | GI Unit | EQT384 Tank No. 672 Reslurry Tank |
| GRP028 | GI Unit | EQT385 Tank No. 762B Reslurry Tank |
| GRP028 | GI Unit | EQT386 Tank No. 772B Reslurry Tank |
| GRP028 | GI Unit | EQT387 Tank No. 117 Sump Collection Tank |
| GRP028 | GI Unit | EQT388 Tank No. 797 Basket Wash Collection Tank |
| GRP028 | GI Unit | EQT389 Tank No. 142 Basket Wash Collection Tank |
| GRP028 | GI Unit | EQT390 Tank No. 042 Basket Wash Collection Tank |
| GRP028 | GI Unit | EQT391 Tank No. 717 Solids Recovery Tank |
| GRP028 | GI Unit | EQT392 Tank No. 815 Hydrolyzer Quench Tank |
| GRP028 | GI Unit | EQT393 Tank No. 301 Hydrolyzer Quench Tank |
| GRP028 | GI Unit | EQT395 Tank No. 505 I-L Centrifuge Siphon Tank |
| GRP028 | GI Unit | EQT398 Tank No. 705 Bulk Centrifuge Siphon Tank |
| GRP028 | GI Unit | EQT399 Tank No. 610 L Centrifuge Overflow Tank |
| GRP028 | GI Unit | EQT400 Tank No. 668 M-O Centrifuge Overflow Tank |
| GRP028 | GI Unit | EQT402 Vessel No. 726 Hydrolyzer No. 1 |
| GRP028 | GI Unit | EQT403 Vessel No. 618 Hydrolyzer No. 2 |
| GRP028 | GI Unit | EQT404 Vessel No. 118 Hydrolyzer No. 3 |
| GRP028 | GI Unit | EQT405 Vessel No. 018 Hydrolyzer No. 4 |
| GRP028 | GI Unit | EQT406 Vessel No. 318 Hydrolyzer No. 5 |
| GRP028 | GI Unit | EQT407 Vessel No. 418 Hydrolyzer No. 6 |
| GRP028 | GI Unit | EQT408 Vessel No. 102 Hydrolyzer No. 7 |
| GRP028 | GI Unit | EQT409 Vessel No. 202 Hydrolyzer No. 8 |
| GRP028 | GI Unit | EQT410 Vessel No. 735 PM Reactor A |
| GRP028 | GI Unit | EQT411 Vessel No. 738 PM Reactor B |
| GRP028 | GI Unit | EQT412 Vessel No. 645 PM Reactor C |
| GRP028 | GI Unit | EQT413 Vessel No. 845A PM Reactor D |
| GRP028 | GI Unit | EQT414 Vessel No. 145 PM Reactor E |
| GRP028 | GI Unit | EQT415 Vessel No. 245 PM Reactor F |
| GRP028 | GI Unit | EQT416 Vessel No. 045 PM Reactor G |
| GRP028 | GI Unit | EQT417 Vessel No. 845B PM Reactor H |
| GRP028 | GI Unit | EQT418 Vessel No. 345 PM Reactor I |
| GRP028 | GI Unit | EQT419 Vessel No. 945 PM Reactor J |
| GRP028 | GI Unit | EQT420 Vessel No. 445 PM Reactor K |
| GRP028 | GI Unit | EQT421 Vessel No. 545 PM Reactor L |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20030007

Permit Number: 2574-V4

Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|-------------|---|
| GRP028 | GI Unit | EQT422 Vessel No. 151 PM Reactor M |
| GRP028 | GI Unit | EQT423 Vessel No. 251 PM Reactor N |
| GRP028 | GI Unit | EQT424 Vessel No. 351 PM Reactor O |
| GRP028 | GI Unit | EQT426 Vessel No. 747 Crystallizer A |
| GRP028 | GI Unit | EQT427 Vessel No. 745 Crystallizer B |
| GRP028 | GI Unit | EQT428 Vessel No. 650 Crystallizer C |
| GRP028 | GI Unit | EQT429 Vessel No. 850A Crystallizer D |
| GRP028 | GI Unit | EQT430 Vessel No. 550A Crystallizer E |
| GRP028 | GI Unit | EQT431 Vessel No. 750 Crystallizer F |
| GRP028 | GI Unit | EQT432 Vessel No. 050 Crystallizer G |
| GRP028 | GI Unit | EQT433 Vessel No. 850B Crystallizer H |
| GRP028 | GI Unit | EQT434 Vessel No. 350 Crystallizer I |
| GRP028 | GI Unit | EQT435 Vessel No. 950 Crystallizer J |
| GRP028 | GI Unit | EQT436 Vessel No. 450 Crystallizer K |
| GRP028 | GI Unit | EQT437 Vessel No. 550B Crystallizer L |
| GRP028 | GI Unit | EQT438 Vessel No. 161 Crystallizer M |
| GRP028 | GI Unit | EQT439 Vessel No. 261 Crystallizer N |
| GRP028 | GI Unit | EQT440 Vessel No. 361 Crystallizer O |
| GRP028 | GI Unit | EQT442 Equipment No. 763 Centrifuge A |
| GRP028 | GI Unit | EQT443 Equipment No. 773 Centrifuge B |
| GRP028 | GI Unit | EQT444 Equipment No. 657A Centrifuge C |
| GRP028 | GI Unit | EQT445 Equipment No. 857A Centrifuge D |
| GRP028 | GI Unit | EQT446 Equipment No. 557A Centrifuge E |
| GRP028 | GI Unit | EQT447 Equipment No. 757A Centrifuge F |
| GRP028 | GI Unit | EQT448 Equipment No. 057 Centrifuge G |
| GRP028 | GI Unit | EQT449 Equipment No. 857B Centrifuge H |
| GRP028 | GI Unit | EQT450 Equipment No. 357 Centrifuge I |
| GRP028 | GI Unit | EQT451 Equipment No. 957 Centrifuge J |
| GRP028 | GI Unit | EQT452 Equipment No. 457 Centrifuge K |
| GRP028 | GI Unit | EQT453 Equipment No. 557B Centrifuge L |
| GRP028 | GI Unit | EQT454 Equipment No. 173 Centrifuge M |
| GRP028 | GI Unit | EQT455 Equipment No. 174 Centrifuge N |
| GRP028 | GI Unit | EQT456 Equipment No. 273 Centrifuge O |
| GRP028 | GI Unit | EQT457 Equipment No. 373A Centrifuge P |
| GRP028 | GI Unit | EQT460 Equipment No. 710A Bulk Centrifuge No. 1 |
| GRP028 | GI Unit | EQT461 Equipment No. 720 Bulk Centrifuge No. 2 |
| GRP028 | GI Unit | EQT462 Equipment No. 780 Bulk Centrifuge No. 3 |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|--------------------------|---|
| GRP028 | G1 Unit | EQT463 Equipment No. 657B, Bulk Centrifuge No. 4 |
| GRP028 | G1 Unit | EQT464 Equipment No. 790, Bulk Centrifuge No. 5 |
| GRP028 | G1 Unit | EQT465 Equipment No. 757B, Bulk Centrifuge No. 6 |
| GRP028 | G1 Unit | EQT466 Equipment No. 710B, Flash Dryer A |
| GRP028 | G1 Unit | EQT467 Equipment No. 410, Flash Dryer B |
| GRP028 | G1 Unit | EQT468 Equipment No. 665, Flash Dryer C |
| GRP028 | G1 Unit | EQT469 Equipment No. 865, Flash Dryer D |
| GRP028 | G1 Unit | FUG6 42-96B, Fugitive Emissions from Glyphosate Plant |
| GRP032 | Hydrolyzers 1 - 8 | EQT402 Vessel No. 726, Hydrolyzer No. 1 |
| GRP032 | Hydrolyzers 1 - 8 | EQT403 Vessel No. 618, Hydrolyzer No. 2 |
| GRP032 | Hydrolyzers 1 - 8 | EQT404 Vessel No. 118, Hydrolyzer No. 3 |
| GRP032 | Hydrolyzers 1 - 8 | EQT405 Vessel No. 018, Hydrolyzer No. 4 |
| GRP032 | Hydrolyzers 1 - 8 | EQT406 Vessel No. 318, Hydrolyzer No. 5 |
| GRP032 | Hydrolyzers 1 - 8 | EQT407 Vessel No. 418, Hydrolyzer No. 6 |
| GRP032 | Hydrolyzers 1 - 8 | EQT408 Vessel No. 102, Hydrolyzer No. 7 |
| GRP032 | Hydrolyzers 1 - 8 | EQT409 Vessel No. 202, Hydrolyzer No. 8 |
| GRP032 | Hydrolyzers 1 - 8 | EQT410 Vessel No. 735, PM Reactor A |
| GRP033 | PM Reactors A - H, M - O | EQT411 Vessel No. 738, PM Reactor B |
| GRP033 | PM Reactors A - H, M - O | EQT412 Vessel No. 645, PM Reactor C |
| GRP033 | PM Reactors A - H, M - O | EQT413 Vessel No. 845A, PM Reactor D |
| GRP033 | PM Reactors A - H, M - O | EQT414 Vessel No. 145, PM Reactor E |
| GRP033 | PM Reactors A - H, M - O | EQT415 Vessel No. 245, PM Reactor F |
| GRP033 | PM Reactors A - H, M - O | EQT416 Vessel No. 045, PM Reactor G |
| GRP033 | PM Reactors A - H, M - O | EQT417 Vessel No. 845B, PM Reactor H |
| GRP033 | PM Reactors A - H, M - O | EQT422 Vessel No. 151, PM Reactor I |
| GRP033 | PM Reactors A - H, M - O | EQT423 Vessel No. 251, PM Reactor N |
| GRP033 | PM Reactors A - H, M - O | EQT424 Vessel No. 351, PM Reactor O |
| GRP034 | PM Reactors A - H, M - O | EQT41B Vessel No. 345, PM Reactor I |
| GRP034 | PM Reactors I - L | EQT419 Vessel No. 945, PM Reactor J |
| GRP034 | PM Reactors I - L | EQT420 Vessel No. 445, PM Reactor K |
| GRP034 | PM Reactors I - L | EQT421 Vessel No. 545, PM Reactor L |
| GRP035 | Crystallizers A - O | EQT426 Vessel No. 747, Crystallizer A |
| GRP035 | Crystallizers A - O | EQT427 Vessel No. 745, Crystallizer B |
| GRP035 | Crystallizers A - O | EQT428 Vessel No. 650, Crystallizer C |
| GRP035 | Crystallizers A - O | EQT429 Vessel No. 850A, Crystallizer D |
| GRP035 | Crystallizers A - O | EQT430 Vessel No. 550A, Crystallizer E |
| GRP035 | Crystallizers A - O | EQT431 Vessel No. 750, Crystallizer F |

INVENTORIES

A1 ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|--|--|
| GRP035 | Crystallizers A - O | EQT432 Vessel No. 050 Crystallizer G |
| GRP035 | Crystallizers A - O | EQT433 Vessel No. 850B Crystallizer H |
| GRP035 | Crystallizers A - O | EQT434 Vessel No. 350 Crystallizer I |
| GRP035 | Crystallizers A - O | EQT435 Vessel No. 950 Crystallizer J |
| GRP035 | Crystallizers A - O | EQT436 Vessel No. 450 Crystallizer K |
| GRP035 | Crystallizers A - O | EQT437 Vessel No. 550B Crystallizer L |
| GRP035 | Crystallizers A - O | EQT438 Vessel No. 161 Crystallizer M |
| GRP035 | Crystallizers A - O | EQT439 Vessel No. 261 Crystallizer N |
| GRP035 | Crystallizers A - O | EQT440 Vessel No. 361 Crystallizer O |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT442 Equipment No. 763 Centrifuge A |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT443 Equipment No. 773 Centrifuge B |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT444 Equipment No. 657A Centrifuge C |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT445 Equipment No. 857A Centrifuge D |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT446 Equipment No. 557A Centrifuge E |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT447 Equipment No. 757A Centrifuge F |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT448 Equipment No. 057 Centrifuge G |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT449 Equipment No. 857B Centrifuge H |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT450 Equipment No. 357 Centrifuge I |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT451 Equipment No. 957 Centrifuge J |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT452 Equipment No. 457 Centrifuge K |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT453 Equipment No. 557B Centrifuge L |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT454 Equipment No. 173 Centrifuge M |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT455 Equipment No. 174 Centrifuge N |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT456 Equipment No. 273 Centrifuge O |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT457 Equipment No. 373A Centrifuge P |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT460 Equipment No. 710A Bulk Centrifuge No. 1 |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT461 Equipment No. 720 Bulk Centrifuge No. 2 |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT462 Equipment No. 780 Bulk Centrifuge No. 3 |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT463 Equipment No. 657B Bulk Centrifuge No. 4 |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT464 Equipment No. 790 Bulk Centrifuge No. 5 |
| GRP036 | Centrifuges A-P & Bulk Centrifuges 1-6 | EQT465 Equipment No. 757B Bulk Centrifuge No. 6 |
| GRP037 | Thermal Oxidizers 1, 2, 3, 5 | EQT295 Equipment No. 363 Thermal Oxidizer No. 1 |
| GRP037 | Thermal Oxidizers 1, 2, 3, 5 | EQT296 Equipment No. 373B Thermal Oxidizer No. 2 |
| GRP037 | Thermal Oxidizers 1, 2, 3, 5 | EQT297 Equipment No. 880 Thermal Oxidizer No. 3 |
| GRP037 | Thermal Oxidizers 1, 2, 3, 5 | EQT299 Equipment No. 325 Thermal Oxidizer No. 5 |
| GRP038 | Scrubbers - Rupture Disk Emissions Cap | EQT228 8-90 Process Scrubber E |
| GRP038 | Scrubbers - Rupture Disk Emissions Cap | EQT229 1-94 Process Scrubber G |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Subject Item Groups:

| ID | Description | Included Components (from Above) |
|--------|---|---|
| GRP038 | Scrubbers - Rupture Disk Emissions Cap | EQT231 20-95 Fume Scrubber I |
| GRP038 | Scrubbers - Rupture Disk Emissions Cap | EQT232 20-98 Process Scrubber M |
| GRP038 | Scrubbers - Rupture Disk Emissions Cap | EQT233 13-96 Formaldehyde Tank Scrubber |
| GRP039 | Scrubbers A - E, G, GI Centrifuge, I, M | EQT224 1-74 Fume Scrubber A |
| GRP039 | Scrubbers A - E, G, GI Centrifuge, I, M | EQT225 41-77 Fume Scrubber B |
| GRP039 | Scrubbers A - E, G, GI Centrifuge, I, M | EQT226 1-88 Fume Scrubber C |
| GRP039 | Scrubbers A - E, G, GI Centrifuge, I, M | EQT227 1-89 Fume Scrubber D |
| GRP039 | Scrubbers A - E, G, GI Centrifuge, I, M | EQT228 8-90 Process Scrubber E |
| GRP039 | Scrubbers A - E, G, GI Centrifuge, I, M | EQT229 1-94 Process Scrubber G |
| GRP039 | Scrubbers A - E, G, GI Centrifuge, I, M | EQT230 3-95 GI Centrifuge Scrubber |
| GRP039 | Scrubbers A - E, G, GI Centrifuge, I, M | EQT231 20-95 Fume Scrubber I |
| GRP039 | Scrubbers A - E, G, GI Centrifuge, I, M | EQT232 20-98 Process Scrubber M |
| GRP040 | DSIDA Storage Tanks 1 - 6 | EQT237 5-86 DSIDA Storage Tank No. 1 |
| GRP040 | DSIDA Storage Tanks 1 - 6 | EQT238 2-88 DSIDA Storage Tank No. 2 |
| GRP040 | DSIDA Storage Tanks 1 - 6 | EQT239 7-90 DSIDA Storage Tank No. 3 |
| GRP040 | DSIDA Storage Tanks 1 - 6 | EQT240 24-95 DSIDA Storage Tank No. 4 |
| GRP040 | DSIDA Storage Tanks 1 - 6 | EQT241 37-95 DSIDA Storage Tank No. 5 |
| GRP040 | DSIDA Storage Tanks 1 - 6 | EQT242 23-98 DSIDA Storage Tank No. 6 |

Relationships:

| Subject Item | Relationship | Subject Item |
|-----------------------------|-------------------------|---|
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT256 Tank No. 375 DSIDA Day Tank |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT257 Tank No. 376 DSIDA Day Tank |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT260 Tank No. 761 Centrifuge Feed Tank A |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT261 Tank No. 771 Centrifuge Feed Tank B |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT285 Equipment No. 363 Thermal Oxidizer No. 1 |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT300 Tank No. 127 A-D Waste Collection Tank |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT341 Tank No. 751 A-D Centrifuge Washwater Tank |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT342 Tank No. 374 A-D TO Quench Tank |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT343 Tank No. 364 E-F TO Quench Tank |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT347 Tank No. 580 TO Condensate Collection Tank |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT357 Tank No. 360 Basket Wash Surge Tank |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT387 Tank No. 117 Sump Collection Tank |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT388 Tank No. 797 Basket Wash Collection Tank |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT442 Equipment No. 763 Centrifuge A |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT443 Equipment No. 773 Centrifuge B |
| EQT224 1-74 Fume Scrubber A | Controls emissions from | EQT444 Equipment No. 657A Centrifuge C |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
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Relationships:

| Relationship | Subject Item | Subject Item |
|-------------------------|---|--------------|
| Controls emissions from | EQT445 Equipment No. 857A Centrifuge D | |
| Controls emissions from | EQT466 Equipment No. 710B Flash Dryer A | |
| Controls emissions from | EQT296 Equipment No. 373B Thermal Oxidizer No. 2 | |
| Controls emissions from | EQT251 Tank No. 101 Formalin Storage Tank | |
| Controls emissions from | EQT252 Tank No. 102 Formalin Storage Tank | |
| Controls emissions from | EQT256 Tank No. 375 DSIDA Day Tank | |
| Controls emissions from | EQT257 Tank No. 376 DSIDA Day Tank | |
| Controls emissions from | EQT260 Tank No. 761 Centrifuge Feed Tank A | |
| Controls emissions from | EQT261 Tank No. 771 Centrifuge Feed Tank B | |
| Controls emissions from | EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | |
| Controls emissions from | EQT300 Tank No. 127 A-D Waste Collection Tank | |
| Controls emissions from | EQT341 Tank No. 751 A-D Centrifuge Washwater Tank | |
| Controls emissions from | EQT342 Tank No. 374 A-D TO Quench Tank | |
| Controls emissions from | EQT343 Tank No. 364 E-F TO Quench Tank | |
| Controls emissions from | EQT347 Tank No. 580 TO Condensate Collection Tank | |
| Controls emissions from | EQT357 Tank No. 360 Basket Wash Surge Tank | |
| Controls emissions from | EQT388 Tank No. 797 Basket Wash Collection Tank | |
| Controls emissions from | EQT442 Equipment No. 763 Centrifuge A | |
| Controls emissions from | EQT443 Equipment No. 773 Centrifuge B | |
| Controls emissions from | EQT444 Equipment No. 657A Centrifuge C | |
| Controls emissions from | EQT445 Equipment No. 857A Centrifuge D | |
| Controls emissions from | EQT467 Equipment No. 410 Flash Dryer B | |
| Controls emissions from | EQT296 Equipment No. 373B Thermal Oxidizer No. 2 | |
| Controls emissions from | EQT387 Tank No. 117 Sump Collection Tank | |
| Controls emissions from | EQT251 Tank No. 101 Formalin Storage Tank | |
| Controls emissions from | EQT252 Tank No. 102 Formalin Storage Tank | |
| Controls emissions from | EQT262 Tank No. 665 Centrifuge Feed Tank C | |
| Controls emissions from | EQT468 Equipment No. 665 Flash Dryer C | |
| Controls emissions from | EQT559 Tank No. 860 Reslurry Tank D | |
| Controls emissions from | EQT560 Tank No. 660 Reslurry Tank C | |
| Controls emissions from | EQT263 Tank No. 855A Centrifuge Feed Tank D | |
| Controls emissions from | EQT469 Equipment No. B65 Flash Dryer D | |
| Controls emissions from | EQT559 Tank No. 860 Reslurry Tank D | |
| Controls emissions from | EQT560 Tank No. 660 Reslurry Tank C | |
| Controls emissions from | EQT262 Tank No. 665 Centrifuge Feed Tank C | |
| Controls emissions from | EQT264 Tank No. 555A Centrifuge Feed Tank E | |
| Controls emissions from | EQT265 Tank No. 755A Centrifuge Feed Tank F | |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Relationships:

| Subject Item | Relationship | Subject Item |
|------------------------------------|-------------------------|--|
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT296 Equipment No. 373B Thermal Oxidizer No. 2 |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT301 Tank No. 274 E-F Waste Collection Tank |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT360 Tank No. 285 Off Spec Tank |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT366 Tank No. 708 Intermediate Feed Tank |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT367 Tank No. 176 Intermediate Feed Tank |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT372 Tank No. 126 E-F Emergency Vent Tank |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT376 Tank No. 562B Reslurry Tank E |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT377 Tank No. 572 Reslurry Tank E |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT378 Tank No. 762A Reslurry Tank F |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT379 Tank No. 772A Reslurry Tank F |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT389 Tank No. 142 Basket Wash Collection Tank |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT446 Equipment No. 557A Centrifuge E |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT447 Equipment No. 757A Centrifuge F |
| EQT228 8-90 Process Scrubber E | Controls emissions from | EQT266 Tank No. 055 Centrifuge Feed Tank G |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT267 Tank No. 855B Centrifuge Feed Tank H |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT297 Equipment No. 880 Thermal Oxidizer No. 3 |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT302 Tank No. 472A G-H Waste Collection Tank |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT362 Tank No. 340 CT Slurry Storage Tank |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT373 Tank No. 026 G-H Emergency Vent Tank |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT380 Tank No. 062 Reslurry Tank G |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT381 Tank No. 072 Reslurry Tank G |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT382 Tank No. 862 Reslurry Tank H |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT383 Tank No. 872 Reslurry Tank H |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT390 Tank No. 042 Basket Wash Collection Tank |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT448 Equipment No. 057 Centrifuge G |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT449 Equipment No. 857B Centrifuge H |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT344 Tank No. 883 G-H TO Quench Tank |
| EQT229 1-94 Process Scrubber G | Controls emissions from | EQT278 Tank No. 701 Bulk Centrifuge Feed Tank 1 |
| EQT230 3-95 GI Centrifuge Scrubber | Controls emissions from | EQT279 Tank No. 733 Bulk Centrifuge Feed Tank 2 |
| EQT230 3-95 GI Centrifuge Scrubber | Controls emissions from | EQT280 Tank No. 781 Bulk Centrifuge Feed Tank 3 |
| EQT230 3-95 GI Centrifuge Scrubber | Controls emissions from | EQT282 Tank No. 808 Bulk Centrifuge Feed Tank 5 |
| EQT230 3-95 GI Centrifuge Scrubber | Controls emissions from | EQT289 Tank No. 713 Bulk Centrate Receiver |
| EQT230 3-95 GI Centrifuge Scrubber | Controls emissions from | EQT305 Tank No. 722 Bulk Waste Collection Tank |
| EQT230 3-95 GI Centrifuge Scrubber | Controls emissions from | EQT391 Tank No. 717 Solids Recovery Tank |
| EQT230 3-95 GI Centrifuge Scrubber | Controls emissions from | EQT398 Tank No. 705 Bulk Centrifuge Siphon Tank |
| EQT230 3-95 GI Centrifuge Scrubber | Controls emissions from | EQT460 Equipment No. 710A Bulk Centrifuge No. 1 |
| EQT230 3-95 GI Centrifuge Scrubber | Controls emissions from | EQT461 Equipment No. 720 Bulk Centrifuge No. 2 |

INVENTORIES

AID: 1096 - Monsanto Co - Luling Plant
Activity Number: PER20030007
Permit Number: 2574-V4
Air - Title V Regular Permit Renewal

Relationships:

| Subject Item | Relationship | Subject Item |
|------------------------------------|-------------------------|---|
| EQT230 3-95 GI Centrifuge Scrubber | Controls emissions from | EQT462 Equipment No. 780 Bulk Centrifuge No. 3 |
| EQT230 3-95 GI Centrifuge Scrubber | Controls emissions from | EQT464 Equipment No. 790 Bulk Centrifuge No. 5 |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT253 Tank No. 201 Formalin Storage Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT254 Tank No. 203 Formalin Storage Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT268 Tank No. 355 Centrifuge Feed Tank I |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT269 Tank No. 455 Centrifuge Feed Tank J |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT270 Tank No. 555B Centrifuge Feed Tank K |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT271 Tank No. 955 Centrifuge Feed Tank L |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT281 Tank No. 655 Bulk Centrifuge Feed Tank 4 |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT283 Tank No. 755B Bulk Centrifuge Feed Tank 6 |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT298 Equipment No. 170 Thermal Oxidizer No. 4 |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT303 Tank No. 830 I-L Waste Collection Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT345 Tank No. 171B I-L TO Quench Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT348 Tank No. 163 TO Condensate Collection Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT350 Tank No. 462 Reslurry Tank I |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT351 Tank No. 472B Reslurry Tank J |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT352 Tank No. 562A Reslurry Tank L |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT358 Tank No. 597 Basket Wash Collection Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT363 Tank No. 476 CT Slurry Storage Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT374 Tank No. 818 I-L Emergency Vent Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT384 Tank No. 672 Reslurry Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT385 Tank No. 762B Reslurry Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT386 Tank No. 772B Reslurry Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT392 Tank No. 815 Hydrolyzer Quench Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT395 Tank No. 505 I-L Centrifuge Siphon Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT399 Tank No. 610 L Centrifuge Overflow Tank |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT450 Equipment No. 357 Centrifuge I |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT451 Equipment No. 857 Centrifuge J |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT452 Equipment No. 457 Centrifuge K |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT453 Equipment No. 557B Centrifuge L |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT463 Equipment No. 657B Bulk Centrifuge No. 4 |
| EQT231 20-95 Fume Scrubber I | Controls emissions from | EQT465 Equipment No. 757B Bulk Centrifuge No. 6 |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT255 Tank No. 692 Formalin Storage Tank |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT258 Tank No. 680 DSIDA Day Tank |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT272 Tank No. 171B Centrifuge Feed Tank M |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT273 Tank No. 175 Centrifuge Feed Tank N |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT274 Tank No. 271 Centrifuge Feed Tank O |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
Activity Number: PER20030007
Permit Number: 2574-V4
Air - Title V Regular Permit Renewal

Relationships:

| Relationships: | Subject Item | Relationship | Subject Item |
|---|-------------------------|---|--------------|
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT275 Tank No. 371 Centrifuge Feed Tank P | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT346 Tank No. 332 M-O TO Quench Tank | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT349 Tank No. 317 TO Condensate Collection Tank | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT353 Tank No. 191B Reslurry Tank M | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT354 Tank No. 291 Reslurry Tank N | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT364 Tank No. 686 CT Slurry Storage Tank | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT375 Tank No. 304 M-O Emergency Vent Tank | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT359 Tank No. 181 Basket Wash Collection Tank | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT393 Tank No. 301 Hydrolyzer Quench Tank | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT400 Tank No. 668 M-O Centrifuge Overflow Tank | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT454 Equipment No. 173 Centrifuge M | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT455 Equipment No. 174 Centrifuge N | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT456 Equipment No. 273 Centrifuge O | |
| EQT232 20-98 Process Scrubber M | Controls emissions from | EQT457 Equipment No. 373A Centrifuge P | |
| EQT233 13-96 Formaldehyde Tank Scrubber | Controls emissions from | EQT251 Tank No. 101 Formalin Storage Tank | |
| EQT233 13-96 Formaldehyde Tank Scrubber | Controls emissions from | EQT252 Tank No. 102 Formalin Storage Tank | |
| EQT233 13-96 Formaldehyde Tank Scrubber | Controls emissions from | EQT371 Tank No. 517 A-D Emergency Vent Tank | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT312 Tank No. 511.1 A-D BCME Hydrolysis Tank | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT313 Tank No. 511.2 A-D BCME Hydrolysis Tank | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT322 Tank No. 729 Acid Heel Tank No. 1 | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT323 Tank No. 621 Acid Heel Tank No. 2 | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT330 Tank No. 329 HCl Scrubber Tank No. 1 | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT331 Tank No. 633 HCl Scrubber Tank No. 2 | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT336 Tank No. 306 HCl Surge Tank No. 1 | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT402 Vessel No. 726 Hydrolyzer No. 1 | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT403 Vessel No. 618 Hydrolyzer No. 2 | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT410 Vessel No. 735 PM Reactor A | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT411 Vessel No. 738 PM Reactor B | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT412 Vessel No. 645 PM Reactor C | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT413 Vessel No. 845A PM Reactor D | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT426 Vessel No. 747 Crystallizer A | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT427 Vessel No. 745 Crystallizer B | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT428 Vessel No. 650 Crystallizer C | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT429 Vessel No. 850A Crystallizer D | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT291 Tank No. 301 HCl Storage Tank | |
| EQT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT292 Tank No. 302 HCl Storage Tank | |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Relationships:

| Subject Item | Relationship | Subject Item |
|--|-------------------------|---|
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT293 Tank No. 333A HCl Storage Tank |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT308 Tank No. 290 E-F BCMÉ Scrubber Hold Tank |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT314 Tank No. 282 E-F BCMÉ Hydrolysis Tank |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT315 Tank No. 283 E-F BCMÉ Hydrolysis Tank |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT324 Tank No. 121 Acid Heel Tank No. 3 |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT322 Tank No. 133 HCl Scrubber Tank No. 3 |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT337 Tank No. 139 HCl Surge Tank No. 3 |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT404 Vessel No. 118 Hydrolyzer No. 3 |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT414 Vessel No. 145 PM Reactor E |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT415 Vessel No. 245 PM Reactor F |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT430 Vessel No. 550A Crystallizer E |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT431 Vessel No. 750 Crystallizer F |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT285 Tank No. 460 E-F Centrate Receiver |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT284 Tank No. 150 A-D Centrate Receiver |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT307 Tank No. 510 A-D BCMÉ Scrubber Hold Tank |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT308 Tank No. 290 E-F BCMÉ Scrubber Hold Tank |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT314 Tank No. 282 E-F BCMÉ Hydrolysis Tank |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT315 Tank No. 283 E-F BCMÉ Hydrolysis Tank |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT324 Tank No. 121 Acid Heel Tank No. 3 |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT332 Tank No. 133 HCl Scrubber Tank No. 3 |
| EOT295 Equipment No. 363 Thermal Oxidizer No. 1 | Controls emissions from | EQT337 Tank No. 139 HCl Surge Tank No. 3 |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT404 Vessel No. 118 Hydrolyzer No. 3 |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT414 Vessel No. 145 PM Reactor E |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT415 Vessel No. 245 PM Reactor F |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT430 Vessel No. 550A Crystallizer E |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT431 Vessel No. 750 Crystallizer F |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT312 Tank No. 511.1 A-D BCMÉ Hydrolysis Tank |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT313 Tank No. 511.2 A-D BCMÉ Hydrolysis Tank |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT322 Tank No. 729 Acid Heel Tank No. 1 |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT323 Tank No. 621 Acid Heel Tank No. 2 |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT330 Tank No. 329 HCl Scrubber Tank No. 1 |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT331 Tank No. 633 HCl Scrubber Tank No. 2 |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT336 Tank No. 306 HCl Surge Tank No. 1 |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT402 Vessel No. 726 Hydrolyzer No. 1 |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT403 Vessel No. 618 Hydrolyzer No. 2 |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT410 Vessel No. 735 PM Reactor A |
| EOT295 Equipment No. 373B Thermal Oxidizer No. 2 | Controls emissions from | EQT411 Vessel No. 738 PM Reactor B |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Relationships:

| Relationship | Subject Item | Subject Item |
|-------------------------|---|--------------|
| Controls emissions from | EQT412 Vessel No. 615 PM Reactor C | |
| Controls emissions from | EQT413 Vessel No. 845A PM Reactor D | |
| Controls emissions from | EQT426 Vessel No. 747 Crystallizer A | |
| Controls emissions from | EQT427 Vessel No. 745 Crystallizer B | |
| Controls emissions from | EQT428 Vessel No. 650 Crystallizer C | |
| Controls emissions from | EQT429 Vessel No. 850A Crystallizer D | |
| Controls emissions from | EQT291 Tank No. 301 HCl Storage Tank | |
| Controls emissions from | EQT292 Tank No. 302 HCl Storage Tank | |
| Controls emissions from | EQT293 Tank No. 333A HCl Storage Tank | |
| Controls emissions from | EQT284 Tank No. 150 A-D Centrate Receiver | |
| Controls emissions from | EQT307 Tank No. 510 A-D BCME Scrubber Hold Tank | |
| Controls emissions from | EQT285 Tank No. 460 E-F Centrate Receiver | |
| Controls emissions from | EQT309 Tank No. 490 G-H BCME Scrubber Hold Tank | |
| Controls emissions from | EQT316 Tank No. 482 G-H BCME Hydrolysis Tank | |
| Controls emissions from | EQT317 Tank No. 483 G-H BCME Hydrolysis Tank | |
| Controls emissions from | EQT325 Tank No. 021 Acid Heel Tank No. 4 | |
| Controls emissions from | EQT333 Tank No. 033 HCl Scrubber Tank No. 4 | |
| Controls emissions from | EQT338 Tank No. 039 HCl Surge Tank No. 4 | |
| Controls emissions from | EQT405 Vessel No. 018 Hydrolyzer No. 4 | |
| Controls emissions from | EQT416 Vessel No. 045 PM Reactor G | |
| Controls emissions from | EQT417 Vessel No. 845B PM Reactor H | |
| Controls emissions from | EQT432 Vessel No. 050 Crystallizer G | |
| Controls emissions from | EQT433 Vessel No. 850B Crystallizer H | |
| Controls emissions from | EQT286 Tank No. 260 G-H Centrate Receiver | |
| Controls emissions from | EQT310 Tank No. 188 H-L BCME Scrubber Hold Tank | |
| Controls emissions from | EQT318 Tank No. 191A I-L BCME Hydrolysis Tank | |
| Controls emissions from | EQT319 Tank No. 192 I-L BCME Hydrolysis Tank | |
| Controls emissions from | EQT326 Tank No. 321 Acid Heel Tank No. 5 | |
| Controls emissions from | EQT327 Tank No. 421 Acid Heel Tank No. 6 | |
| Controls emissions from | EQT334 Tank No. 333B HCl Scrubber Tank No. 5 | |
| Controls emissions from | EQT339 Tank No. 339 HCl Surge Tank No. 5 | |
| Controls emissions from | EQT406 Vessel No. 318 Hydrolyzer No. 5 | |
| Controls emissions from | EQT407 Vessel No. 418 Hydrolyzer No. 6 | |
| Controls emissions from | EQT418 Vessel No. 345 PM Reactor I | |
| Controls emissions from | EQT419 Vessel No. 945 PM Reactor J | |
| Controls emissions from | EQT420 Vessel No. 445 PM Reactor K | |
| Controls emissions from | EQT421 Vessel No. 545 PM Reactor L | |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Relationships:

| Subject Item | Relationship | Subject Item |
|---|-------------------------|---|
| EQT298 Equipment No. 170 Thermal Oxidizer No. 4 | Controls emissions from | EQT434 Vessel No. 350 Crystallizer I |
| EQT298 Equipment No. 170 Thermal Oxidizer No. 4 | Controls emissions from | EQT435 Vessel No. 950 Crystallizer J |
| EQT298 Equipment No. 170 Thermal Oxidizer No. 4 | Controls emissions from | EQT436 Vessel No. 450 Crystallizer K |
| EQT298 Equipment No. 170 Thermal Oxidizer No. 4 | Controls emissions from | EQT437 Vessel No. 550B Crystallizer L |
| EQT298 Equipment No. 170 Thermal Oxidizer No. 4 | Controls emissions from | EQT287 Tank No. 660 I-L Centrate Receiver |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT304 Tank No. 601 M-O Waste Collection Tank |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT311 Tank No. 308 M-O BCME Scrubber Hold Tank |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT320 Tank No. 311 M-O BCME Hydrolysis Tank |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT321 Tank No. 312 M-O BCME Hydrolysis Tank |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT328 Tank No. 105 Acid Heel Tank No. 7 |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT329 Tank No. 205 Acid Heel Tank No. 8 |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT335 Tank No. 113 HCl Scrubber Tank No. 6 |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT340 Tank No. 109 HCl Surge Tank No. 6 |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT408 Vessel No. 102 Hydrolyzer No. 7 |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT409 Vessel No. 202 Hydrolyzer No. 8 |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT422 Vessel No. 151 PM Reactor M |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT423 Vessel No. 251 PM Reactor N |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT424 Vessel No. 351 PM Reactor O |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT438 Vessel No. 161 Crystallizer M |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT439 Vessel No. 261 Crystallizer N |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT440 Vessel No. 361 Crystallizer O |
| EQT299 Equipment No. 325 Thermal Oxidizer No. 5 | Controls emissions from | EQT288 Tank No. 187 M-O Centrate Receiver |

Stack Information:

| ID | Velocity (ft/sec) | Flow Rate (cubic ft/min-actual) | Diameter (feet) | Discharge Area (square feet) | Height (feet) | Temperature (°F) |
|---|----------------------|------------------------------------|--------------------|---------------------------------|------------------|---------------------|
| EQT224 1-74 Fume Scrubber A | 28.4 | 10770 | 2.75 | .75 | 110 | 107 |
| EQT225 41-77 Fume Scrubber B | 28.4 | 10770 | 2.75 | .75 | 110 | 107 |
| EQT226 1-88 Fume Scrubber C | 28.4 | 10770 | 2.75 | .75 | 110 | 107 |
| EQT227 1-89 Fume Scrubber D | 28.4 | 10770 | 2.75 | .75 | 110 | 107 |
| EQT228 8-90 Process Scrubber E | 16 | 3000 | 2 | .04 | 110 | 80 |
| EQT229 1-94 Process Scrubber G | 16 | 1000 | 2 | .04 | 110 | 80 |
| EQT230 3-95 GI Centrifuge Scrubber | 170 | 2000 | .5 | .25 | 103 | 80 |
| EQT231 20-95 Fume Scrubber I | 50 | 22000 | 3.5 | .75 | 110 | 107 |
| EQT232 20-98 Process Scrubber M | 50 | 22000 | 3.5 | .75 | 110 | 107 |
| EQT233 13-96 Formaldehyde Tank Scrubber | 15 | 200 | .5 | .025 | 125 | 140 |
| EQT235 4-86 PIA Warehouse Silo 787 Baghouse | 24 | 2000 | 1.33 | .33 | 70 | 85 |
| EQT236 9-90 PIA Warehouse Silo 160 Baghouse | 33 | 1100 | .83 | .083 | 100 | 80 |
| EQT237 5-86 DSIDA Storage Tank No. 1 | 2.84 | 33.4 | .5 | .016 | 32.5 | 80 |
| EQT238 2-88 DSIDA Storage Tank No. 2 | 2.84 | 33.4 | .5 | .016 | 32.5 | 80 |

INVENTORIES

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Stack Information:

| ID | | Velocity (ft/sec) | Flow Rate (cubic ft/min-actual) | Diameter (feet) | Discharge Area (square feet) | Height (feet) | Temperature (°F) |
|--------|---|----------------------|------------------------------------|--------------------|---------------------------------|------------------|---------------------|
| EQT239 | 7-90 DSIDA Storage Tank No. 3 | 2.84 | 33.4 | .5 | | 38 | 80 |
| EQT240 | 24-95 DSIDA Storage Tank No. 4 | 2.84 | 33.4 | .5 | | 32.5 | 80 |
| EQT241 | 37-95 DSIDA Storage Tank No. 5 | 2.84 | 33.4 | .5 | | 32.5 | 80 |
| EQT242 | 23-98 DSIDA Storage Tank No. 6 | 2.84 | 33.4 | .5 | | 32.5 | 80 |
| EQT243 | 7-06 CT Overheads Tank 1 | 3 | 1 | .25 | | 30 | 100 |
| EQT244 | 8-06 CT Overheads Tank 2 | 3 | 1 | .25 | | 30 | 100 |
| EQT245 | 24-98 G/H Cooling Tower | 16 | 400000 | 450 | | 30 | 110 |
| EQT246 | 25-98 C/D Cooling Tower | 16 | 400000 | 450 | | 30 | 110 |
| EQT247 | 26-98 E/F Cooling Tower | 16 | 400000 | 450 | | 30 | 110 |
| EQT248 | 28-98 K/J/K Cooling Tower | 16 | 400000 | 450 | | 30 | 110 |
| EQT249 | 29-98 M/N/O Cooling Tower | 16 | 400000 | 450 | | 30 | 110 |
| FUG006 | 42-96B Fugitive Emissions from Glyphosate Plant | | | | | 15 | 80 |

Fee Information:

| Subj Item Id | Multiplier | Units Of Measure | Fee Desc |
|--------------|------------|------------------|--|
| GRP028 | 1004 | MM Lb/Yr | 0690 - Chemical and Chemical Prep. N.E.C. (Rated Capacity) |

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

All phases

| Subject Item | PM ₁₀ | | | SO ₂ | | | NOX | | | CO | | | VOC | | | | |
|------------------|------------------|-----------|---------|-----------------|-----------|---------|-----------|-----------|---------|-----------|-----------|---------|-----------|-----------|---------|------|------|
| | Avg lb/hr | Max lb/hr | Tons/hr | Avg lb/hr | Max lb/hr | Tons/hr | Avg lb/hr | Max lb/hr | Tons/hr | Avg lb/hr | Max lb/hr | Tons/hr | Avg lb/hr | Max lb/hr | Tons/hr | | |
| EQT 224 1-74 | 0.80 | 2.40 | 3.50 | < | 0.01 | 0.04 | < | 0.01 | 0.11 | 4.71 | 0.48 | 0.91 | 3.19 | 3.99 | 1.13 | 3.53 | 4.95 |
| EQT 225 41-77 | 0.80 | 2.40 | 3.50 | 0.02 | 0.04 | 0.09 | 2.30 | 4.71 | 10.07 | 1.14 | 3.19 | 4.99 | 1.13 | 3.53 | 4.94 | | |
| EQT 226 1-88 | 0.80 | 1.60 | 3.50 | < | 0.01 | < | 0.01 | 0.11 | 0.22 | 0.48 | 0.91 | 1.82 | 3.99 | 1.08 | 2.16 | 4.73 | |
| EQT 227 1-89 | 0.80 | 1.60 | 3.50 | < | 0.01 | < | 0.01 | 0.11 | 0.22 | 0.48 | 0.91 | 1.82 | 3.99 | 1.08 | 2.16 | 4.73 | |
| EQT 228 8-90 | 0.14 | 0.28 | 0.61 | 0.01 | 0.02 | 0.04 | 1.20 | 2.40 | 5.26 | 0.48 | 0.96 | 2.10 | | | 131.86 | | |
| EQT 229 1-94 | 0.12 | 0.24 | 0.53 | 0.01 | 0.02 | 0.04 | 0.78 | 1.56 | 3.42 | 0.24 | 0.48 | 1.05 | | | 131.50 | | |
| EQT 230 3-95 | 0.22 | 0.44 | 0.81 | | | | | | | | | | | 1.17 | 2.34 | 5.2 | |
| EQT 231 20-95 | 0.70 | 1.40 | 3.07 | 0.01 | 0.02 | 0.04 | 2.00 | 4.00 | 8.76 | 0.60 | 1.20 | 2.63 | | | 132.90 | | |
| EQT 232 20-98 | 0.70 | 1.40 | 3.07 | 0.01 | 0.02 | 0.04 | 2.00 | 4.00 | 8.76 | 0.60 | 1.20 | 2.63 | | | 132.68 | | |
| EQT 233 13-96 | | | | | | | | | | | | | | | 130.37 | | |
| EQT 235 4-96 | 0.42 | 0.70 | 1.83 | | | | | | | | | | | | | | |
| EQT 236 9-90 | 0.36 | 0.60 | 1.57 | | | | | | | | | | | | | | |
| EQT 237 5-86 | | | | | | | | | | | | | | | | | |
| EQT 238 2-88 | | | | | | | | | | | | | | | | | |
| EQT 239 7-90 | | | | | | | | | | | | | | | | | |
| EQT 240 2-95 | | | | | | | | | | | | | | | | | |
| EQT 241 31-95 | | | | | | | | | | | | | | | | | |
| EQT 242 23-98 | | | | | | | | | | | | | | | | | |

EMISSION RATES FOR CRITERIA POLLUTANTS

AIID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20030007

Permit Number: 2574-V4

Air - Title V Regular Permit Renewal

All phases

| Subject Item | PM ₁₀ | | | SO ₂ | | | NOx | | | CO | | | VOC | | |
|-------------------|------------------|-----------|-----------|-----------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| | Avg lb/hr | Max lb/hr | Tons/Year | Avg lb/hr | Max lb/hr | Tons/Year | Avg lb/hr | Max lb/hr | Tons/Year | Avg lb/hr | Max lb/hr | Tons/Year | Avg lb/hr | Max lb/hr | Tons/Year |
| EQT 243 7-98 | | | | | | | | | | < | 0.001 | 0.002 | 0.004 | | |
| EQT 244 8-96 | | | | | | | | | | < | 0.01 | 0.002 | 0.004 | | |
| EQT 245 24-98 | | | | | | | | | | < | 0.01 | 15 < | 0.01 | | |
| EQT 246 25-98 | | | | | | | | | | < | 0.01 | 15 < | 0.01 | | |
| EQT 247 26-98 | | | | | | | | | | < | 0.01 | 15 < | 0.01 | | |
| EQT 248 28-98 | | | | | | | | | | < | 0.01 | 15 < | 0.01 | | |
| EQT 249 29-98 | | | | | | | | | | < | 0.01 | 15 < | 0.01 | | |
| FUG 006 42-96B | | | | | | | | | | | 0.21 | 0.43 | 0.94 | | |
| GRP 038 | | | | | | | | | | | 4.76 | 20.81 | | | |

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

Permit Phase Totals:

PM10: 25.49 tons/yr
 SO2: 0.25 tons/yr
 NOx: 37.71 tons/yr
 CO: 25.37 tons/yr
 VOC: 46.67 tons/yr

Emission rates Notes:
 GRP 038 VOC Tons/Year

This Emission represents an Annual Emissions Cap for Scrubbers 8-90 (EQT 228), 1-94 (EQT 229), 20-95 (EQT 231), 13-96 (EQT 233), and 20-98 (EQT 232).
 Which Months: All Year

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

All phases

| Ammonia | | | Formaldehyde | | | Hydrochloric acid | | | Methanol | | | Methyl chloride | | | |
|------------------|-----------|-----------|--------------|-----------|-----------|-------------------|-----------|-----------|-----------|-----------|-----------|-----------------|-----------|-----------|------|
| Subject Item | Avg lb/hr | Max lb/hr | Tons/Year | Avg lb/hr | Max lb/hr | Tons/Year | Avg lb/hr | Max lb/hr | Tons/Year | Avg lb/hr | Max lb/hr | Tons/Year | Avg lb/hr | Max lb/hr | |
| EQT 224 1-74 | | | | 0.49 | 1.63 | 2.15 | 0.05 | 0.15 | 0.22 | 0.16 | 0.48 | 0.70 | 0.22 | 0.56 | 0.96 |
| EQT 225 4-77 | | | | 0.50 | 1.63 | 2.19 | 0.05 | 0.15 | 0.22 | 0.16 | 0.48 | 0.70 | 0.17 | 0.56 | 0.74 |
| EQT 226 1-88 | | | | 0.49 | 0.98 | 2.15 | 0.05 | 0.10 | 0.22 | 0.16 | 0.32 | 0.70 | 0.17 | 0.34 | 0.74 |
| EQT 227 1-89 | | | | 0.49 | 0.98 | 2.15 | 0.05 | 0.10 | 0.22 | 0.16 | 0.32 | 0.70 | 0.17 | 0.34 | 0.74 |
| EQT 228 8-90 | | | | | 9.54 | | | | 17.10 | | 0.32 | | | 121.34 | |
| EQT 229 1-94 | | | | | 9.26 | | | | 17.10 | | 0.32 | | | 121.34 | |
| EQT 230 3-95 | | | | 0.31 | 0.62 | 1.50 | 0.86 | 1.72 | 3.80 | 0.23 | 0.46 | 1.00 | 0.26 | 0.52 | 1.10 |
| EQT 231 20-95 | | | | | 9.70 | | | | 17.76 | | 0.48 | | | 121.54 | |
| EQT 232 20-96 | | | | | 9.70 | | | | 17.10 | | 0.40 | | | 121.40 | |
| EQT 233 13-96 | | | | | 9.37 | | | | 17.0 | | | | | 121.0 | |
| EQT 237 5-96 | 0.18 | 1.03 | 0.79 | 0.01 | 0.22 | 0.05 | | | | | | | | | |
| EQT 238 2-88 | 0.18 | 1.03 | 0.79 | 0.01 | 0.22 | 0.05 | | | | | | | | | |
| EQT 239 7-90 | 0.30 | 1.03 | 1.33 | 0.02 | 0.37 | 0.08 | | | | | | | | | |
| EQT 240 24-95 | 0.17 | 1.03 | 0.72 | 0.01 | 0.20 | 0.04 | | | | | | | | | |
| EQT 241 37-95 | 0.17 | 1.03 | 0.72 | 0.01 | 0.20 | 0.04 | | | | | | | | | |
| EQT 242 23-98 | 0.41 | 1.03 | 1.81 | 0.02 | 0.50 | 0.10 | | | | | | | | | |
| EQT 243 7-96 | | | | < 0.001 | 0.001 | 0.002 | | | | | | | | | |
| EQT 244 B-96 | | | | < 0.001 | 0.001 | 0.002 | | | | | | | | | |

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

All phases

| Ammonia | | Formaldehyde | | Hydrochloric acid | | Methanol | | Methyl chloride | |
|-------------------|-----------|--------------|-----------|-------------------|-----------|-----------|-----------|-----------------|-----------|
| Subject Item | Avg lb/hr | Max lb/hr | Tons/Year | Avg lb/hr | Max lb/hr | Tons/Year | Avg lb/hr | Max lb/hr | Tons/Year |
| FUG 006 42-96B | | | 0.21 | 0.43 | 0.94 | | | | |
| GRP 038 | | | 1.25 | | 5.45 | 0.55 | 2.41 | 0.76 | |

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

Permit Parameter Totals:

Ammonia: 6.16 tons/yr
Formaldehyde: 16.89 tons/yr
 Hydrochloric acid: 7.09 tons/yr
Methanol: 7.13 tons/yr
Methyl chloride: 8.43 tons/yr

Emission Rates Notes:

GRP 038 Formaldehyde Tons/Year This Emission represents an Annual Emissions Cap for Scrubbers B-90 (EQT 228), 1-94 (EQT 229), 20-95 (EQT 231), 13-96 (EQT 233), and 20-98 (EQT 232). Which Months: All Year
 GRP 038 Hydrochloric acid Tons/Year This Emission represents an Annual Emissions Cap for Scrubbers B-90 (EQT 228), 1-94 (EQT 229), 20-95 (EQT 231), 13-96 (EQT 233), and 20-98 (EQT 232). Which Months: All Year
 GRP 038 Methanol Tons/Year This Emission represents an Annual Emissions Cap for Scrubbers B-90 (EQT 228), 1-94 (EQT 229), 20-95 (EQT 231), 13-96 (EQT 233), and 20-98 (EQT 232). Which Months: All Year
 GRP 038 Methyl chloride Tons/Year This Emission represents an Annual Emissions Cap for Scrubbers B-90 (EQT 228), 1-94 (EQT 229), 20-95 (EQT 231), 13-96 (EQT 233), and 20-98 (EQT 232). Which Months: All Year

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

EQT224 1-74 Fume Scrubber A

- 1 pH \geq 7.0 s.u. STATE ONLY. [LAC 33:III.501.C.6]
 - Which Months: All Year Statistical Basis: Hourly average
- 2 Flow rate \geq 170 gallons/min. STATE ONLY. [LAC 33:III.501.C.6]
 - Which Months: All Year Statistical Basis: Hourly average
- 3 Exiting gases from Thermal Oxidizer No 1 shall be directed to either Fume Scrubber A (E.P. 1-74) or Fume Scrubber B (E.P. 41-77). Permittee shall operate the scrubbers to maintain 99 % removal efficiency for HCl or limit the outlet concentration to less than or equal to 20 ppmv. STATE ONLY. [LAC 33:III.501.C.6]

EQT225 41-77 Fume Scrubber B

- 4 pH \geq 7.0 s.u. STATE ONLY. [LAC 33:III.501.C.6]
 - Which Months: All Year Statistical Basis: Hourly average
- 5 Flow rate \geq 170 gallons/min. STATE ONLY. [LAC 33:III.501.C.6]
 - Which Months: All Year Statistical Basis: Hourly average
- 6 Exiting gases from Thermal Oxidizer No 1 shall be directed to either Fume Scrubber A (E.P. 1-74) or Fume Scrubber B (E.P. 41-77). Permittee shall operate the scrubbers to maintain 99 % removal efficiency for HCl or limit the outlet concentration to less than or equal to 20 ppmv. STATE ONLY. [LAC 33:III.501.C.6]

EQT226 1-88 Fume Scrubber C

- 7 pH \geq 7.0 s.u. STATE ONLY. [LAC 33:III.501.C.6]
 - Which Months: All Year Statistical Basis: Hourly average
- 8 Flow rate \geq 150 gallons/min. STATE ONLY. [LAC 33:III.501.C.6]
 - Which Months: All Year Statistical Basis: Hourly average

EQT227 1-89 Fume Scrubber D

- 9 pH \geq 7.0 s.u. STATE ONLY. [LAC 33:III.501.C.6]
 - Which Months: All Year Statistical Basis: Hourly average
- 10 Flow rate \geq 150 gallons/min. STATE ONLY. [LAC 33:III.501.C.6]
 - Which Months: All Year Statistical Basis: Hourly average

EQT228 8-90 Process Scrubber E

- 11 pH \geq 7.0 s.u. STATE ONLY. [LAC 33:III.501.C.6]
 - Which Months: All Year Statistical Basis: Hourly average
- 12 Flow rate \geq 140 gallons/min. STATE ONLY. [LAC 33:III.501.C.6]
 - Which Months: All Year Statistical Basis: Hourly average
- 13 Exiting gases from Thermal Oxidizer No 2 shall be directed to Process Scrubber E (E.P. 8-90). Permittee shall operate the scrubber to maintain 99 % removal efficiency for HCl or limit the outlet concentration to less than or equal to 20 ppmv. STATE ONLY. [LAC 33:III.501.C.6]

EQT229 1-94 Process Scrubber G

- 14 pH \geq 7.0 s.u. STATE ONLY. [LAC 33:III.501.C.6]
 - Which Months: All Year Statistical Basis: Hourly average

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20030007

Permit Number: 2574-V4

Air - Title V Regular Permit Renewal

EQT229 1-94 Process Scrubber G15 Flow rate \geq 140 gallons/min. STATE ONLY. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Hourly average

16 Exiting gases from Thermal Oxidizer No 3 shall be directed to Process Scrubber G (E.P. 1-94). Permittee shall operate the scrubber to maintain 99 % removal efficiency for HCl or limit the outlet concentration to less than or equal to 20 ppmv. STATE ONLY. [LAC 33:III.501.C.6]

EQT230 3-95 GI Centrifuge Scrubber17 Flow rate \geq 90 gallons/min. STATE ONLY. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Hourly average

EQT231 20-95 Fume Scrubber I18 pH \geq 7.0 s.u.. STATE ONLY. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Hourly average

19 Flow rate \geq 360 gallons/min. STATE ONLY. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Hourly average

20 Exiting gases from Thermal Oxidizer No 4 shall be directed to Fume Scrubber I (E.P. 20-95). Permittee shall operate this scrubber to maintain 99 % removal efficiency for HCl or limit the outlet concentration to less than or equal to 20 ppmv. STATE ONLY. [LAC 33:III.501.C.6]

EQT232 20-98 Process Scrubber M21 pH \geq 7.0 s.u.. STATE ONLY. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Hourly average

22 Flow rate \geq 360 gallons/min. STATE ONLY. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Hourly average

23 Exiting gases from Thermal Oxidizer No 5 shall be directed to Process Scrubber M (E.P. 20-98). Permittee shall operate the scrubber to maintain 99 % removal efficiency for HCl or limit the outlet concentration to less than or equal to 20 ppmv. STATE ONLY. [LAC 33:III.501.C.6]

EQT233 13-96 Formaldehyde Tank Scrubber24 pH \geq 7.0 s.u.. STATE ONLY. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Hourly average

25 Flow rate \geq 60 gallons/min. STATE ONLY. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Hourly average

26 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Permittee shall maintain formaldehyde removal efficiency \geq 90 % or concentration of formaldehyde in the vent \leq 20 ppmv. Determined as MACT. [LAC 33:III.5109.A]**EQT235 4-86 PIA Warehouse Silo 787 Baghouse**27 Opacity \leq 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]

Which Months: All Year Statistical Basis: Six-minute average

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20030007

Permit Number: 2574-V4

Air - Title V Regular Permit Renewal

EQT235 4-86 PIA Warehouse Silo 787 Baghouse

28 Particulate matter (10 microns or less) monitored by visual inspection/determination daily. Permittee shall visually inspect the baghouse vents and emission point 4-86 on a daily basis. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: None specified

29 Particulate matter (10 microns or less); Baghouse shall be inspected every six months that the baghouse is in operation and whenever visual checks indicate inspection may be necessary. Baghouse filter elements shall be changed as necessary. [LAC 33:III.501.C.6]

30 Particulate matter (10 microns or less); Records of maintenance inspections and activities shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

EQT236 9-90 PIA Warehouse Silo 160 Baghouse

31 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]

Which Months: All Year Statistical Basis: Six-minute average

32 Particulate matter (10 microns or less) monitored by visual inspection/determination daily. Permittee shall visually inspect the baghouse vents and emission point 9-90 on a daily basis. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: None specified

33 Particulate matter (10 microns or less); Baghouse shall be inspected every six months that the baghouse is operating and whenever visual checks indicate inspection may be necessary. Baghouse filter elements shall be changed as necessary. [LAC 33:III.501.C.6]

34 Particulate matter (10 microns or less); Records of maintenance inspections and activities shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

EQT298 Equipment No. 170 Thermal Oxidizer No. 4

35 Oxidation units shall operate under the following conditions: Exit gas Temperature >= 1650 F. STATE ONLY. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Hourly average

36 Oxidation units shall operate under the following conditions: Maintain a minimum exit gas O₂ concentration of 2 %, measured on an hourly average basis. STATE ONLY. [LAC 33:III.501.C.6]

37 Records of O₂ concentrations, combustion temperature, and shutdown times shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. STATE ONLY. [LAC 33:III.501.C.6]

38 When an emergency, unplanned shutdown, or shutdown necessary to conduct required maintenance operations on the thermal oxidizer occurs, permittee shall shut down the four trains (I, J, K, & L). In these situations, the trains shall not be placed back into service until the thermal oxidizer conditions provided are restored. STATE ONLY. [LAC 33:III.501.C.6]

39 Temperature spikes below 1620 F shall not exceed a total of 6 minutes per hour. STATE ONLY. [LAC 33:III.501.C.6]

40 Oxidation units shall operate under the following conditions: Exiting CO concentration shall not be more than 50 ppmv. [LAC 33:III.501.C.6]

41 Each unit shall be equipped with continuous O₂ and CO monitors. Instead of a continuous CO monitor, the permittee can monitor CO concentration with operating parameters established in accordance with the approval of the Office of Environmental Assessment, Environmental Technology Division during performance tests. STATE ONLY. [LAC 33:III.501.C.6]

42 Permittee shall develop and implement a written startup, shutdown, and malfunction plan. Permittee shall notify the Office of Environmental Compliance, Enforcement Division if any deviations for the written plan occur. The notification shall be made within 7 days after the occurrence. [LAC 33:III.501.C.6]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

Equipment No. 170 Thermal Oxidizer No. 4**EQT298**

- 43 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources, Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources and Method 18 - Determination of Volatile Organic Carbon (speciated for Methyl Chloride) from Stationary Sources. Total VOC concentration can be substituted for Methyl Chloride if the Total VOC is 1 ppmv or less by using Method 25A. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. [LAC 33:III.501.C.6]
- 44 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Control exiting Methyl Chloride to 1 ppmv or less. Source shall maintain DRE $\geq 99.99\%$ and vent to scrubbers. Determined as MACT. [LAC 33:III.5109.A]
- 45 Comply with the requirements of PSD-LA-623. This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-623. The thermal oxidizer No. 4 was selected as BACT for CO emissions from PM Reactors I, J, K, & L. [State Requirement LAC 33:III.509 and Federal Requirement 40 CFR 52]. [40 CFR 52]

FUG006 **42-96B Fugitive Emissions from Glyphosate Plant**

- 46 Identify each piece of equipment in a process unit subject to this MACT determination such that it can be distinguished readily from equipment that is not subject to this MACT determination, as specified in Subsection C.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]
- 47 VOC, Total monitored by technically sound method within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled to determine if it is leaking, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]
- 48 Which Months: All Year Statistical Basis: None specified
 VOC, Total recordkeeping by logbook within 90 days of placing equipment back in service that had been physically removed from service, disassembled or dismantled. Maintain records as required in Subsection Q.5, as specified in Subsection C.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]
- 49 Compressors: Determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both, as specified in Paragraph E.6.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]
- 50 Compressors: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection E.8 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected. [LAC 33:III.5109.A]
- 51 Pressure relief device in gas/vapor service: VOC, Total < 500 ppm except during pressure releases, as measured by the method specified in Section P.3, as specified in Section F.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]
- Which Months: All Year Statistical Basis: None specified
- 52 Pressure relief device in gas/vapor service: After each pressure release, return to a condition of no leakage, as indicated by an instrument reading of less than 500 ppm, as soon as practicable, but no later than five calendar days after each pressure release, except as provided in Section F.2.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]
- 53 Pressure relief device in gas/vapor service: VOC, Total monitored by the regulation's specified method(s) within 5 days (calendar) after the pressure release to confirm the condition of no leakage, as indicated by an instrument reading of less than 500 ppm above background, as specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.3. [LAC 33:III.5109.A]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

FUG006 **42-96B Fugitive Emissions from Glyphosate Plant**

- 54 Pressure relief device in gas/vapor service: Equip with a closed-vent system capable of capturing and transporting leakage from the pressure relief device to a control device as described in Section N, as specified in Section F.2.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Alternative to Subsections F.1 and F.2. [LAC 33:III.5109.A]
- 55 Valves in gas/vapor service and in light liquid service: VOC, Total monitored by the regulation's specified method(s) quarterly, as specified in Subsection I.1 of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Subsection P.2. If an instrument reading of 1000 ppm or greater is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection I.3. [LAC 33:III.5109.A]
- 56 Valves in gas/vapor service and in light liquid service (percent leaking valves ≥ 4): VOC, Total monitored by the regulation's specified method(s) monthly, as specified in Subsection I.7 of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Subsection P.2. Initiate monthly monitoring within 60 days of the previous monitoring and continue until the percent of leaking valves is less than 4, at which time monitoring can be performed in accordance with Subsection I.1. [LAC 33:III.5109.A]
- 57 Which Months: All Year Statistical Basis: None specified
 Valves in gas/vapor service and in light liquid service (percent leaking valves ≤ 2 for two consecutive quarterly leak detection periods): VOC, Total monitored by the regulation's specified method(s) semiannually, as specified in Paragraph J.2.a of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Section P. If the percentage of valves leaking is greater than 2 for any monitoring period, comply with the requirements as described in Section I, as specified in Paragraph J.2.c of the Louisiana MACT Determination for Refinery Equipment Leaks (July 26, 1994). Optional alternative to quarterly monitoring. [LAC 33:III.5109.A]
- 58 Which Months: All Year Statistical Basis: None specified
 Valves in gas/vapor service and in light liquid service (percent leaking valves ≤ 2 for two consecutive semiannual leak detection periods): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Paragraph J.2.b of the Louisiana MACT Determination for Non-HON Equipment Leak (March 30, 1995). Monitor using the method specified in Section P. If the percentage of valves leaking is greater than 2 for any monitoring period, comply with the requirements as described in Section I, as specified in Paragraph J.2.c of the Louisiana MACT Determination for Refinery Equipment Leaks (July 26, 1994). Optional alternative to quarterly monitoring. [LAC 33:III.5109.A]
- 59 Which Months: All Year Statistical Basis: None specified
 Valves in gas/vapor service and in light liquid service: Repair leaks as soon as practicable, but no later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection I.3 and I.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected. [LAC 33:III.5109.A]
- 60 Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: VOC, Total monitored by the regulation's specified method(s) within 5 days of finding evidence of a potential leak by visual, audible, olfactory, or any other detection method, as specified in Section K.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Subsection P.2. If an instrument reading of 10000 ppm or greater for agitators, 2000 ppm or greater for pumps or 1000 ppm or greater for valves, connectors, instrument systems, or pressure relief devices is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection K.3. [LAC 33:III.5109.A]
- 61 Which Months: All Year Statistical Basis: None specified
 Instrument systems and pressure relief devices in liquid service; and pumps, valves, connectors, and agitators in heavy liquid service: Repair leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Section M, as specified in Subsection K.3 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after each leak is detected. [LAC 33:III.5109.A]
- 62 Delay of Repair: Repair equipment before the end of the next process unit shutdown, if repair is technically infeasible without a process unit shutdown, as specified in Subsection M.1 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

FUG006 **42-96B Fugitive Emissions from Glyphosate Plant**

- 63 Connectors in gas/vapor service and in light liquid service: VOC, Total monitored by the regulation's specified method(s) once initially, as specified in Subsections O.1 and O.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If an instrument reading ≥ 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M. [LAC 33:III.5109.A]
- Which Months: All Year Statistical Basis: None specified
- 64 Connectors in gas/vapor service and in light liquid service (percent of leaking connectors ≤ 2): VOC, Total monitored by the regulation's specified method(s) annually, as specified in Subsections O.2 and O.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitoring must be performed within one year from the previous monitoring. Monitor using the method specified in Section P. If an instrument reading ≥ 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M. [LAC 33:III.5109.A]
- Which Months: All Year Statistical Basis: None specified
- 65 Connectors in gas/vapor service and in light liquid service (percent of leaking connectors > 2): VOC, Total monitored by the regulation's specified method(s) quarterly until good performance is obtained or until four quarterly monitorings have been performed, as specified in Subsections O.2 and O.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If good performance has not been obtained after four quarters of monitoring, monitor the remaining unchecked connectors within six months of the last quarterly monitoring period, as specified in Subsection O.6 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). If monitoring of the remaining connectors indicates that good performance has not been obtained, monitor in accordance with Subsection O.4. If monitoring of the remaining connectors indicates that good performance has not been obtained, monitor using the method specified in Section P. If an instrument reading ≥ 1000 ppm is measured, a leak is detected. If a leak is detected, initiate repair provisions specified in Subsection O.9, except as provided in Section M. [LAC 33:III.5109.A]
- Which Months: All Year Statistical Basis: None specified
- 66 Connectors in gas/vapor service and in light liquid service (welded completely around the circumference of the interface or physically removed and the pipe welded together): Equipment/operational data monitored by the regulation's specified method(s) within three months after being welded. Check the integrity of the weld by monitoring according to the procedures in Section P or by testing using x-ray, acoustic monitoring, hydrotesting, or other applicable method, as specified in Subsection O.7 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Subsection O. [LAC 33:III.5109.A]
- Which Months: All Year Statistical Basis: None specified
- 67 Connectors in gas/vapor service and in light liquid service (opened or otherwise had the seal broken): VOC, Total monitored by the regulation's specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had the seal broken, including those determined to be unrepairable prior to process unit shutdown, as specified in Paragraph O.8.a of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up monitoring detects a leak, initiate repair provisions specified in Subsection O.9, unless it is determined to be unrepairable, in which case it is counted as unrepairable. [LAC 33:III.5109.A]
- Which Months: All Year Statistical Basis: None specified
- 68 Connectors in gas/vapor service and in light liquid service (≤ 1 inch in diameter): Comply with the requirements of Section K, as specified in Paragraph O.8.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the requirements in Paragraph O.2. [LAC 33:III.5109.A]
- 69 Connectors in gas/vapor service and in light liquid service (≤ 1 inch in diameter): VOC, Total monitored by the regulation's specified method(s) within 90 days after being returned to VOTAP service. Monitor each connector that has been opened or has otherwise had the seal broken, as specified in Paragraph O.8.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Monitor using the method specified in Section P. If the follow-up monitoring detects a leak, initiate repair provisions specified in Subsection O.9. Comply with this requirement instead of the requirements in Paragraph O.2. [LAC 33:III.5109.A]
- Which Months: All Year Statistical Basis: None specified
- 70 Connectors in gas/vapor service and in light liquid service: Repair Leaks as soon as practicable, but not later than 15 calendar days after a leak is detected, except as provided in Subsection O.8. Make a first attempt at repair no later than 5 calendar days after each leak is detected. If a leak is detected, monitor the for leaks within the first 90 days after its repair, as specified in Subsection O.9 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20030007

Permit Number: 2574-V4

Air - Title V Regular Permit Renewal

FUG006 Fugitive Emissions from Glyphosate Plant

71 Connectors in gas/vapor service and in light liquid service (inaccessible or glass or glass-lined): Repair leaks as soon as practicable, but no later than 15 calendar days after detecting a leak by visual, audible, olfactory or other means, except as specified in Subsection O.8, as specified in Subsection O.11.b of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Make a first attempt at repair no later than 5 calendar days after the leak is detected, as specified in Subsection O.11.c of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). Comply with this requirement instead of the monitoring requirements of Subsection O.2 through O.6 and the recordkeeping and reporting requirements. [LAC 33:III.5109.A]

72 Connectors in gas/vapor service and in light liquid service: Calculate the percent leaking connectors using the equation in Subsection O.12 for use in determining the monitoring frequency, as specified in Subsection O.12 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]

73 Comply with the test methods and procedures in Section P, as specified in Subsections P.1 through P.5 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]

74 Attach a weatherproof and readily visible identification, marked with the equipment identification, to leaking equipment, as specified in Subsection Q.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]

75 Equipment/operational data recordkeeping by electronic or hard copy continuously. Keep records of the information specified in Subsections Q.1 through Q.13 as applicable, as specified in Section Q of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]

76 Submit report: Due semiannually starting six months after the initial report required in Subsection R.1. Include the information specified in Paragraphs R.2.a through R.2.e, as specified in Subsection R.2 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]

77 Valves in gas/vapor service and in light liquid service (skip period leak detection and repair): Notify DEQ 30 days before implementing any of the alternate provisions of Section J, as specified in Subsection R.4 of the Louisiana MACT Determination for Non-HON Equipment Leaks (March 30, 1995). [LAC 33:III.5109.A]

78 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Permittee shall conduct a leak detection and repair program meeting the requirements of the Louisiana MACT Determination for NON-HON Equipment Leaks, dated March 30, 1995 unless and until superseded by a Federal MACT Requirement. Determined as MACT. [LAC 33:III.5109.A]

79 Comply with the requirements in 40 CFR 63 Subpart FFFF table 6 by the compliance date provided for in the rule. [40 CFR 63.2480]

GRP024 List A Tanks

80 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Emissions shall be vented to the scrubbers. [LAC 33:III.5109.A]

GRP025 List B Tanks

81 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Emissions shall be controlled by thermal oxidizers and/or scrubbers. [LAC 33:III.5109.A]

GRP026 List C Tanks

82 Sources' emissions of Class III TAP's only; no MACT required. [LAC 33:III.Chapter 51]

GRP027 List D Tanks

83 Sources' emissions of Class III TAP's only; no MACT required. [LAC 33:III.Chapter 51]

GRP028 GI Unit

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

GRP028**G1 Unit**

- 84 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5. [LAC 33:III.2113.A]
- 85 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance. [LAC 33:III.219]
- 86 Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited. [LAC 33:III.2901.D]
- 87 If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G. [LAC 33:III.2901.F]
- 88 Carbon monoxide <= 25.37 tons/yr. [LAC 33:III.501.C.6]
 Which Months: All Year Statistical Basis: Annual maximum
- 89 Nitrogen oxides <= 37.71 tons/yr. [LAC 33:III.501.C.6]
 Which Months: All Year Statistical Basis: Annual maximum
- 90 Particulate matter (10 microns or less) <= 25.49 tons/yr. [LAC 33:III.501.C.6]
 Which Months: All Year Statistical Basis: Annual maximum
- 91 Sulfur dioxide <= 0.25 tons/yr. [LAC 33:III.501.C.6]
 Which Months: All Year Statistical Basis: Annual maximum
- 92 VOC, Total <= 46.67 tons/yr. [LAC 33:III.501.C.6]
 Which Months: All Year Statistical Basis: Annual maximum
- 93 Unless otherwise provided for in an underlying regulation, data acquisition covering 95% of the operating time for any consecutive 12-month period shall be deemed sufficient to meet continuous monitoring and recording provisions. [LAC 33:III.501.C.6]
- 94 Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51.Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard. [LAC 33:III.5105.A.1]
- 95 Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109. [LAC 33:III.5105.A.2]
- 96 Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard. [LAC 33:III.5105.A.3]
- 97 Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51.Subchapter A. [LAC 33:III.5105.A.4]
- 98 Submit Annual Emissions Report (TEDI). Due annually, by the 1st of July, to the Office of Environmental Assessment, Air Quality Assessment Division, in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3. [LAC 33:III.5107.A.2]
- 99 Include a certification statement with initial and subsequent annual emission reports and revisions to any emission report to attest that the information contained in the emission report is true, accurate, and complete, and signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official. The certification statement shall read: "I certify, under penalty of perjury, that the emissions data provided is accurate to the best of my knowledge, information, and belief, and I understand that submitting false or misleading information will expose me to prosecution under state regulations" [LAC 33:III.5107.A.3]
- 100 Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but no later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere which results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property). [LAC 33:III.5107.B.1]

SPECIFIC REQUIREMENTS**AI ID: 1096 - Monsanto Co - Luling Plant****Activity Number: PER20030007****Permit Number: 2574-V4****Air - Title V Regular Permit Renewal****GRP028****G1 Unit**

- 101 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC), except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.5112, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.51923. [LAC 33:III.5107.B.2]
- 102 Submit notification: Due to the Office of Environmental Compliance, Emergency and Radiological Services, SPOC, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.5107.B.6. Submit notification in the manner provided in LAC 33:III.51923, except as provided in LAC 33:III.5107.B.6.
- 103 Submit written report: Due within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through 3. Submit report to the Office of Environmental Compliance by certified mail. Include the information specified in LAC 33:III.5107.B.4.a.i through vii. [LAC 33:III.5107.B.4]
- 104 Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, in the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge. [LAC 33:III.5107.B.5]
- 105 Achieve compliance with ambient air standards unless it can be demonstrated to pose a threat to public health or the environment; and that emissions would be economically infeasible; that emissions could not reasonably be expected to pose a threat to public health or the environment; and that emissions would be controlled to a level that is Maximum Achievable Control Technology. [LAC 33:III.5109.B.3]
- 106 Determine the status of compliance, beyond the property line, with applicable ambient air standards listed in LAC 33:III.5112. Table 51.2. [LAC 33:III.5109.B]
- 107 Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III. Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by the department. [LAC 33:III.5109.C]
- 108 Obtain a Louisiana Air Permit in accordance with LAC 33:III.5111.B and C and in accordance with LAC 33:III.5101, before commencement of the construction of any new source. [LAC 33:III.5111.A.1]
- 109 Obtain a permit modification in accordance with LAC 33:III.5111.B and C before commencement of any modification not specified in a compliance plan submitted under LAC 33:III.5109.D, if the modification will result in an increase in emissions of any toxic air pollutant or will create a new point source. [LAC 33:III.5111.A.2.a]
- 110 Do not commence construction or modification of any major source without first obtaining written authorization from DEQ, as specified. [LAC 33:III.5111.A]
- 111 Ensure that all testing done to determine the emission of toxic air pollutants, upon request by the department, is conducted by qualified personnel. [LAC 33:III.5113.B.1]
- 112 Provide necessary sampling and testing facilities, exclusive of instruments and sensing devices, as needed to properly determine the emission of toxic air pollutants, upon request of the department. [LAC 33:III.5113.B.3]
- 113 Provide emission testing facilities as specified in LAC 33:III.5113.B.4 through e. [LAC 33:III.5113.B.4]
- 114 Analyze samples and determine emissions within 30 days after each emission test has been completed. [LAC 33:III.5113.B.5]
- 115 Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of emissions testing. Retain records of emission test results and other data needed to determine emissions. Retained records at the source, or at an alternate location approved by DEQ for a minimum of two years, and make available upon request for inspection by DEQ. [LAC 33:III.5113.B.6]
- 116 Submit notification: Due to the Office of Environmental Assessment, Air Quality Assessment Division, at least 30 days before the emission test. Submit notification of emission test to allow DEQ the opportunity to have an observer present during the test. [LAC 33:III.5113.B.7]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant
Activity Number: PER20030007
Permit Number: 2574-V4
Air - Title V Regular Permit Renewal

GRP028 **GI Unit**

- 117 Maintain and operate each monitoring system in a manner consistent with good air pollution control practices for minimizing emissions. Repair or adjust any breakdown or malfunction of the monitoring system as soon as practicable after its occurrence. [LAC 33:III.5113.C.1]
- 118 Conduct performance evaluation of the monitoring system when required at any other time requested by DEQ. [LAC 33:III.5113.C.2]
- 119 Submit performance evaluation report: Due to the Office of Environmental Assessment, Air Quality Assessment Division, within 60 days of the monitoring system performance evaluation. [LAC 33:III.5113.C.2]
- 120 Submit notification in writing: Due to the Office of Environmental Assessment, Environmental Technology Division at least 30 days before a performance evaluation of the monitoring system is to begin. [LAC 33:III.5113.C.2]
- 121 Install a monitoring system on each effluent or on the combined effluent, when monitoring is required and the effluents from a single source, or from two or more sources subject to the same emission standards, are combined before being released to the atmosphere. If two or more sources are not subject to the same emission standards, install a separate monitoring system on each effluent, unless otherwise specified. If the applicable standard is a mass emission standard and the effluent from one source is released to the atmosphere through more than one point, install a monitoring system at each emission point unless DEQ approves the installation of fewer systems. [LAC 33:III.5113.C.3]
- 122 Evaluate the performance of continuous monitoring systems, upon request by DEQ, in accordance with the requirements and procedures contained in the applicable performance specification of 40 CFR Part 60, appendix B. [LAC 33:III.5113.C.5.a]
- 123 Submit report: Due to DEQ within 60 days of the performance evaluation of the CMS, if requested. Furnish DEQ with two or more copies of a written report of the test results within 60 days. [LAC 33:III.5113.C.5.a]
- 124 Install all continuous monitoring systems or monitoring devices to make representative measurements under variable process or operating parameters, if required to install a CMS. [LAC 33:III.5113.C.5.d]
- 125 Collect and reduce all data as specified in LAC 33:III.C.5.e.i and ii, if required to install a CMS. [LAC 33:III.5113.C.5.e]
- 126 Submit plan: Due to the Office of Environmental Assessment, Air Quality Assessment Division, within 90 days after DEQ requests either the initial plan or an updated plan, if required by DEQ to install a continuous monitoring system. Submit for approval a plan describing the affected sources and the methods for ensuring compliance with the continuous monitoring system. [LAC 33:III.5113.C.5]
- 127 Maintain records of monitoring data, monitoring system calibration checks, and the occurrence and duration of any period during which the monitoring system is malfunctioning or inoperative. Maintain these records at the source, or at an alternative location approved by DEQ, for a minimum of three years and make available, upon request, for inspection by DEQ. [LAC 33:III.5113.C.7]
- 128 Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 5 when the administrative authority declares an Air Pollution Alert. [LAC 33:III.5609.A.1.b]
- 129 Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning. [LAC 33:III.5609.A.2.b]
- 130 Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency. [LAC 33:III.5609.A.3.b]
- 131 Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency. Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611.Tables 5, 6, and 7. [LAC 33:III.5609.A]
- 132 Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901. [LAC 33:III.5901.A]
- 133 Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division, within 60 days after the information in the submitted registration is no longer accurate. [LAC 33:III.5911.C]
- 134 Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D. [LAC 33:III.919.D]
- 135 Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:1.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:1.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases. [LAC 33:III.927]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20030007

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Air - Title V Regular Permit Renewal

GRP028**G1 Unit**

- 136 Formaldehyde <= 16.89 tons/yr. [LAC 33:III.Chapter 51]
Which Months: All Year Statistical Basis: Annual maximum
- 137 Hydrochloric acid <= 7.09 tons/yr. [LAC 33:III.Chapter 51]
Which Months: All Year Statistical Basis: Annual maximum
- 138 Methanol <= 7.13 tons/yr. [LAC 33:III.Chapter 51]
Which Months: All Year Statistical Basis: Annual maximum
- 139 Methyl chloride <= 8.43 tons/yr. [LAC 33:III Chapter 51]
Which Months: All Year Statistical Basis: Annual maximum
- 140 Ammonia <= 6.16 tons/yr. [LAC 33:III.Chapter 51]
Which Months: All Year Statistical Basis: Annual maximum
- 141 All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A. [40 CFR 60]
- 142 Equipment/operational data recordkeeping by electronic or hard copy continuously Maintain records as specified in 40 CFR 61.356(a) through (n). Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF. [40 CFR 61.356]
- 143 Submit report: Due within 90 days after January 7, 1993. Submit a report that summarizes the regulatory status of each waste stream subject to 40 CFR 61.342 and is determined by the procedures specified in 40 CFR 61.355(c) to contain benzene. Include the information specified in 40 CFR 61.357(a)(1) through (a)(4). If there is no benzene onsite in wastes, products, by-products, or intermediates, submit an initial report that is a statement to this effect. Subpart FF. [40 CFR 61.357(a)]
- 144 Submit report: Due whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr (1.1 ton/yr) or more. Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3). Subpart FF. [40 CFR 61.357(b)]
- 145 Permittee shall meet the notification, reporting and recordkeeping requirements specified in 40 CFR 63.2515, 63.2520, and 63.2525 by the compliance dates provided for in the rule. [40 CFR 63.2450(a)]
- 146 Comply with applicable requirements of 40 CFR 63 Subpart FFFF by the compliance dates provided for in the rule. [40 CFR 63]
- 147 All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table 12 of 40 CFR 63 Subpart FFFF. [40 CFR 63]
- 148 Submit Title V permit application for renewal: Due 180 calendar days before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 149 Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
- 150 Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [40 CFR 70.6(a)(3)(iii)(B)]
- 151 Submit Title V compliance certification: Due annually, by the 1st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]

GRP032**Hydrolyzers 1 - 8**

- 152 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Sources shall be vented to thermal oxidizers and scrubbers. Determined as MACT. [LAC 33:III.5109.A]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant

Activity Number: PER20030007

Permit Number: 2574-Y4

Air - Title V Regular Permit Renewal

GRP033 PM Reactors A - H, M - O

153 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Sources shall be vented to thermal oxidizers and scrubbers. Determined as MACT. [LAC 33:III.5109.A]

GRP034 PM Reactors I - L

154 Comply with the requirements of PSD-LA-623. This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-623. CO emissions shall be controlled by Thermal Oxidizer No. 4. Determined as BACT. [LAC 33:III.509]

155 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Sources shall be vented to thermal oxidizers and scrubbers. Determined as MACT. [LAC 33:III.5109.A]

GRP035 Crystallizers A - O

156 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Sources shall be vented to thermal oxidizers and scrubbers. Determined as MACT. [LAC 33:III.5109]

GRP036 Centrifuges A-P & Bulk Centrifuges 1-6

157 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Sources shall be vented to scrubbers. Determined as MACT. [LAC 33:III.5109]

GRP037 Thermal Oxidizers 1, 2, 3, 5

158 Oxidation units shall operate under the following conditions: Exit gas Temperature \geq 1650 F. STATE ONLY. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: Hourly average

159 Oxidation units shall operate under the following conditions: Exiting CO concentration shall not be more than 50 ppmv. STATE ONLY. [LAC 33:III.501.C.6]

160 Oxidation units shall operate under the following conditions: Exiting NOx concentration shall not be more than 150 ppmv. STATE ONLY. [LAC 33:III.501.C.6]

161 Temperature spikes below 1620 F shall not exceed a total of 6 minutes per hour. STATE ONLY. [LAC 33:III.501.C.6]

162 Each unit shall be equipped with a continuous O2 monitor. STATE ONLY. [LAC 33:III.501.C.6]

163 Records of O2 concentrations, combustion temperature, and shutdown times shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. STATE ONLY. [LAC 33:III.501.C.6]

164 Bypassing the thermal oxidation units is not allowed, except in emergencies, which shall be reported to the Office of Environmental Compliance, Enforcement Division. STATE ONLY. [LAC 33:III.501.C.6]

165 Under normal operations Thermal Oxidizer 1 handles Trains A, B, C & D; Thermal Oxidizer 2 handles Trains E & F; Thermal Oxidizer 3 handles Trains G & H; and Thermal Oxidizer 5 handles Trains M, N & O. When an emergency, unplanned shutdown, or shutdown necessary to conduct required maintenance operations on any of the thermal oxidizers occurs, permittee is allowed to route at most six trains to any one thermal oxidizer. Existing gases shall be directed to scrubber A, B, E, G, I or M. Under these situations, the unit shall operate with a minimum hourly average exit gas temperature of 1800 F. STATE ONLY. [LAC 33:III.501.C.6]

166 Continuous operations of the thermal oxidizer units shall be allowed while O2 monitors are down for repairs. However, spare parts and / or monitors shall be kept on the property to minimize operating time without the monitors in place. STATE ONLY. [LAC 33:III.501.C.6]

167 Permittee shall develop and implement a written startup, shutdown, and malfunction plan. Permittee shall notify the Office of Environmental Compliance, Enforcement Division if any deviations for the written plan occur. The notification shall be made within 7 days after the occurrence. STATE ONLY. [LAC 33:III.501.C.6]

SPECIFIC REQUIREMENTS

AI ID: 1096 - Monsanto Co - Luling Plant
 Activity Number: PER20030007
 Permit Number: 2574-V4
 Air - Title V Regular Permit Renewal

GRP037 Thermal Oxidizers 1, 2, 3, 5

168 Oxidation units shall operate under the following conditions: Maintain a minimum exit gas O₂ concentration of 2 %, measured on an hourly average basis. STATE ONLY.
 [LAC 33:III.501.C.6]

- 169 Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources, Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources and Method 18 - Determination of Volatile Organic Carbon (speciated for Methyl Chloride) from Stationary Sources. Total VOC concentration can be substituted for Methyl Chloride if the Total VOC is 1 ppmv or less by using Method 25A. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits. [LAC 33:III.501.C.6]
- 170 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Control exiting Methyl Chloride to 1 ppmv or less. Source shall maintain DRE >= 99.99 % and vent to scrubbers. Determined as MACT. [LAC 33:III.5109.A]

GRP039 Scrubbers A - E, G, GI Centrifuge, 1, M

171 Opacity <= 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1311.C]

Which Months: All Year Statistical Basis: Six-minute average

172 Opacity monitored by visual inspection/determination weekly. Water vapor associated with operation shall not be considered visible emissions. [LAC 33:III.501.C.6]

Which Months: All Year Statistical Basis: None specified

173 Opacity: If visible emissions are detected, then within 3 working days permittee shall conduct a six-minute opacity reading in accordance with EPA Reference Method 9. [LAC 33:III.501.C.6]

174 Permittee shall continuously monitor and record pH and flow rate. STATE ONLY. [LAC 33:III.501.C.6]

175 Opacity records shall be kept on site and available for inspection by the office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]

176 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. Permittee shall maintain formaldehyde removal efficiency >= 90 % or concentration of formaldehyde in the vent <= 20 ppmv. Determined as MACT. [LAC 33:III.5109.A]

177 Meet requirements of 40 CFR 63.4250(e)(3). [40 CFR 63.2450(e)(3)]

178 Establish operating limits under the conditions required for the initial compliance demonstration. [40 CFR 63 Supart FFFF]. [40 CFR 63.2460(c)(3)]

GRP040 DSIDA Storage Tanks 1 - 6

179 Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. The fixed roof design is determined as MACT. [LAC 33:III.5109.A]

Worksheet for Technical Review of Working Draft of Proposed Permit

| | | | | | |
|-----------------------|------------------|-------------------------------------|----------------------|---------------------------|-------------|
| Company Name: | Monsanto Company | AI #: | 1096 | TEMPO Activity No: | PER20030007 |
| Facility Name: | GI Unit | Remarks Submitted by: | William C. Rhodes | | |
| Permit Writer: | Scott J. Templet | Permit Writer Email address: | Scott.Templet@la.gov | | |

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

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| Permit Reference | Remarks | Air Permits Division Response (for official use only) |
|--|---|---|
| S.R. 1, 2, 4, 5, 7, 8, 9, 10, 11, 12, 14, 15, 17, 18, 19, 21, 22, 24, 25 | The statistical basis for these operating limits should be hourly average – this is the basis in the current permit. | Changed Statistical basis to hourly average. |
| S.R. 3, 6, 13, 16, 20, 23 | Add flexibility of demonstrating required HCl control efficiency by limiting outlet concentration to ≤ 20 ppM. This is allowed for in Table 2 of 40 CFR 63 Subpart FFFF (MON). | Added flexibility language as requested. |
| S.R. 13, 16, 23 | Delete the word “either” and change “scrubbers” to “scrubber” | Deleted / Changed wording as necessary. |
| S.R. 26, 27, 28, 29 | These Specific Requirements indicate that we are to monitor and record operating limit values every four hours. While Monsanto can certainly comply with this requirement, we are monitoring and recording these parameters continuously, and suggest that these specific requirements be combined into a single Specific Requirement that establishes continuous monitoring and recordkeeping. | Combined requirements into one requirement. |

| Permit Reference | Remarks | Air Permits Division Response (for official use only) |
|--|--|---|
| S.R. 30 | This Specific Requirement provides for an annual report of any operating limit deviations that must be submitted by March 31 each year. This requirement is not needed as Monsanto submits quarterly deviation reports in accordance with 40 CFR General Condition R for any deviations. Monsanto has many other State-Only specific requirements, only one of which contains this annual report requirement. | Deleted this requirement. |
| S.R. 34, 38 | Reword to state "Baghouse shall be inspected every six months that the baghouse is operating...". These baghouses have been out of service for several years, so this will clarify that the inspections are only needed if we are actually using them. | Changed requirement to add wording as requested. |
| S.R. 35, 39 | Delete the sentence "Particulate matter (10 microns or less) recordkeeping by inspection records continuously." The meaning of this is unclear as we do not maintain these records. | Changed requirement type from recordkeeping to text to eliminate this wording. |
| S.R. 40, 41, 42, 43, 44, 45, 183, 184, 185, 186, 187, 188, 190, 191, 192, 193, 194, 195, 200, 201, 202, 203, 204, 205, 206 | Delete all of these Specific Requirements as they reference LAC 33:III.2115, which does not apply to these items. The opening paragraph of this Section states: "This Section does not apply to waste gas streams that are required...to reduce VOC's to a more stringent standard than would be required by this Section." As noted in Specific Requirement 54, the thermal oxidizers must achieve 99.99% control, and are therefore not subject to this rule. Nor are the PM Reactors, which went to them. | Eliminated requirement due to these equipment having more stringent requirements. |
| S.R. 48 | We suggest adding this Specific Requirement to the end of S.R. 52 to improve readability. | Combined requirements. |
| S.R. 50 | Delete the phrase "any or". | Deleted words. |
| S.R. 52 | The word "I shall" is misspelled. | Corrected spelling. |
| S.R. 54, 55 | We suggest that these Specific Requirements be combined as they are redundant. Also, we request that the flexibility to demonstrate the required DRE is achieved by controlling existing methyl chloride to 1 ppmv or less is added. This is currently provided for in Part 70 Specific Condition 5. | Added Methyl Chloride limitation and combined requirements. |
| N/A | The current permit establishes a CO limitation of 50 ppm | Added the CO limitation for the Thermal Oxidizers. |
| N/A | The draft permit does not include a requirement to conduct a one-time compliance test as discussed in previous meetings. | Added testing requirement for the Thermal Oxidizers. |
| S.R. 57 – 107 | These 56 Specific Requirements comprise all of the details included in Specific Requirement 108, and unnecessarily lengthen the permit. | |
| S.R. 109 | Clarify that this Specific Requirement applies after the MON compliance date. | Added wording. |
| S.R. 175, 176 | Clarify that these Specific Requirements apply in accordance with the schedules provided in the MON. | Added wording. |
| S.R. 212 | Replace the reference to Scrubber J with one to Scrubber M. | Replaced / corrected "J" to "M". |

| Permit Reference | Remarks | Air Permits Division Response (for official use only) |
|---------------------------------|---|---|
| S.R. 215 | Add the phrase "at 1 ppmv or less" to the end of the sentence to make this consistent with the current permit. | Added Methyl Chloride limitation. |
| S.R. 216 | Add the other limitations in the current permit: CO 50 ppmv and NOx 150 ppmv. | Added CO and NOx limitations. |
| S.R. 217 | Delete and/or combine with Specific Requirement 215. | Combined requirements. |
| N/A | The draft permit does not include a requirement to conduct a one-time compliance test as discussed in previous meetings. | Added testing requirement for Thermal Oxidizers. |
| S.R. 221 | Delete the phrase "Opacity recordkeeping by inspection records continuously." We do not continuously inspect these sources. | Changed requirement type from recordkeeping to text to delete this wording. |
| S.R. 222, 223, 224, 225, 226 | These Specific Requirements indicate that we are to monitor and record operating limit values every four hours. While Monsanto can certainly comply with this requirement, we are monitoring and recording these parameters continuously, and suggest that these specific requirements be combined into a single Specific Requirement that establishes continuous monitoring and recordkeeping. | Combined these requirements into one requirement. |
| Table 1, Page 7 | Change the applicability to 2115 for all thermal oxidizers from 1 to 2. | Made necessary changes in Table 1. |
| Table 1, Page 16 | Change the applicability to 2115 for all PM Reactors from 1 to 2. | Made necessary changes in Table 1. |
| Table 1, Pages 11 – 12 | The List C Tanks should have a "1" in the column for applicability to Chapter 51. | Made necessary changes in Table 1. |
| Table 1, Page 12, 27 | The description for EQT 345 should be "I-L TO Quench Tank | Changed name for EQT 345. |
| Table 2, Page 38 | Add a line for all the Thermal Oxidizers showing exemption from 2115 due to being applicable to a more stringent standard. | Added row in Table 2. |
| Table 2, Page 38 | Add a line for all the PM Reactors showing exemption from 2115 due to being applicable to a more stringent standard. | Made necessary changes to Table 2. |
| Inventory, Page 20 | EQT224 also controls emissions from EQT296 (TO 2) | Added relationship. |
| Inventory, Page 21 | EQT225 also controls emissions from EQT296 (TO 2) | Added relationship. |
| Inventory, Page 21 | EQT225 also controls emissions from EQT387 (Sump Tank) | Added relationship. |
| Inventory, Page 21 | EQT227 also controls emissions from EQT262 (CFT C) | Added relationship. |
| Inventory, Page 21 | EQT228 does not control emissions from EQT344 (G/H TO Quench); EQT229 controls these emissions. | Deleted relationship in EQT228 and added relationship to EQT229. |
| Inventory, Page 23 | Name of EQT345 is I-L TO Quench Tank | Changed name. |
| Inventory, Page 24 – 25 | Everything feeding EQT295 (TO 1) can also feed EQT296 (TO 2); also, everything feeding EQT296 (TO 2) can also feed EQT295 (TO 1) | Added relationships. |

Worksheet for Technical Review of Working Draft of Proposed Permit

| | | | | | |
|-----------------------|-------------------------------------|-------------------------------------|-----------------------------|---------------------------|--------------------|
| Company Name: | Monsanto Company | AI #: | 1096 | TEMPO Activity No: | PER20030007 |
| Facility Name: | GI Unit – Fugitive Emissions | Remarks Submitted by: | William C. Rhodes | | |
| Permit Writer: | Scott J. Templet | Permit Writer Email address: | Scott.Templet@la.gov | | |

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| S.R. 60 – 69 | Delete these Specific Requirements as the unit does not contain any pumps in Light Liquid Service | Deleted these requirements. |
| S.R. 76, 77 | Delete these Specific Requirements as the unit does not contain any sampling connection systems | Deleted these requirements. |
| S.R. 83 – 86 | Delete these Specific Requirements as the unit does not contain any Unsafe-to-Monitor valves | Deleted these requirements. |
| S.R. 89 | Delete these Specific Requirements as the unit does not contain any Surge Control Vessels or Bottoms Receivers | Deleted these requirements. |
| S.R. 99, 100 | Delete these Specific Requirements as the unit does not contain any Unsafe-to-Monitor connectors | Deleted these requirements. |

Worksheet for Technical Review of Working Draft of Proposed Permit

| | | | | | |
|----------------|-------------------|---------------|----------------|-----------------------|--------------------------|
| Company Name: | Monsanto Company | AI #: | 1096 | TEMPO Activity No: | PER20030007 |
| Facility Name: | GI Unit | Remarks | Submitted by: | William C. Rhodes | Send to Technical Review |
| Permit Writer: | Scott J. Templett | Permit Writer | Email address: | Scott.Templett@la.gov | Review |

Instructions

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